Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANCA INTESA AD BEOGRAD MILENTIJA POPOVICA 78, BELGRADE, REPUBLIC OF SERBIA

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
. ENTITY	Y & OWNERSHIP	
	Full Legal Name	BANCA INTESA AKCIONARSKO DRUSTVO BEOGRAD (NOVI BEOGRAD)
2	Append a list of foreign branches which are covered by this questionnaire	Banca Intesa ad Beograd does not have foreign branches.
3	Full Legal (Registered) Address	Milentija Popovica 7b, Belgrade, Republic of Serbia
4	Full Primary Business Address (If different from above)	Full Primary Business Address is not different from above.
5	Date of Entity Incorporation/establishment	15.10.1991.
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mulual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Sole direct shareholder of Banca Intesa ad Beograd is Intesa Sanpaolo Holding International S.A. (Luxembourg), 100% owned by Intesa Sanpaolo SpA (Italy), Intesa Sanpaolo SpA is listed on Italian Stock Exchange, no shareholders or beneficial owners with a holding of 10% or more.
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	'
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	National Bank of Serbia
11	Provide Legal Entity Identifier (LEI) if available	5493001XF6EC2NJXK304

13	Jurisdiction of licensing authority and regulator of ultimate parent	Italy, Banca d'Italia
14	Select the business areas applicable to the Entity	
14 a	Retall Banking	Man
14 b		Yes
	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	Yes
141	Multilateral Development Bank	No
14]	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	1
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	
		Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	1
18	If appropriate, provide any additional information/context to the answers in this section.	,
2. PROD	UCTS & SERVICES	P. H. Carling and St. Common C
19	Does the Entity offer the following products and	
10 a	services:	
19 a	services: Correspondent Banking	Yes
19 a1	services: Correspondent Banking If Y	Yes
19 a1 19 a1a	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes No
19 a1 19 a1a 19 a1b	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1 19 a1a	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	No
19 a1 19 a1a 19 a1b	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	No No
19 a1 19 a1a 19 a1b 19 a1c	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No Yes
19 a1 19 a1a 19 a1b 19 a1c	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	No Yes Yes
19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	No No Yes Yes No
19 a1 19 a1c 19 a1c 19 a1c 19 a1c 19 a1c 19 a1f 19 a1f 19 a1f 19 a1f 19 a1h	Services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No Yes Yes No Yes
19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1f	services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No No Yes Yes No Yes No
19 a1 19 a1c 19 a1c 19 a1c 19 a1c 19 a1c 19 a1f 19 a1f 19 a1f 19 a1f 19 a1h	Services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No Yes Yes No Yes No

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	Yes
401		
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 I	Payment services to non-bank entitles who may	
	then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	Lawe trevers to be a first twenter and the second state of the system of the
19 l2	Third Party Payment Service Providers	No
19 13	Virtual Asset Service Providers (VASPs)	No
19 14	eCommerce Platforms	Yes
19 I5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the applicable level of due diligence:	Carlot Market Williams to Market State of the Control of the Contr
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Due diligence
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Due diligence
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Dus diligence
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers	Fridase solact
	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	Products and services that ere new on the financial market, that are cash Intensive and based on new technological solutions are generally classified as high-risky.
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
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3. AML, C	TF & SANCTIONS PROGRAMME	AGAIN TO A MOREST SANTEN AT THE WAXDRING THE BUYEN
3. AML, C 22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Yes
22 22 a	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes Yes
22 a 22 b	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	
22 a 22 b 22 c	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
22 a 22 b 22 c 22 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 a 22 b 22 c 22 d 22 e	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	1
29	If appropriate, provide any additional information/context to the answers in this section.	Regular reporting consists of quarterly, half-annual and annual reporting. Beside regular reporting, frequency of reports caused by modifications of regulations related to AML, CFT & Senctions topics (Serbian national regulation and Parent Bank's regulation) depends on the frequency of such modifications.
4. ANTI	BRIBERY & CORRUPTION	T, RICUADISSE 1650 I STORY ROMBING SERVICE HEROLING LANG.
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	WENT TO THE STATE OF THE SECOND SECOND
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	I .
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by Intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	Well All March 1975 The Company of t
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	,
45	If appropriate, provide any additional information/context to the answers in this section.	Comments for 42e) and 42f): N/A since Banca Intesa Beograd did not outsource its ABC compliance activity to third parties (legal entities, non-employed workers).
5 AMI	 CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	ATEM IN THE A REPORT DESIGNATION OF STREET OF STREET
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a		
46 b	Money laundering	Yes
	Money laundering Terrorist financing	Yes Yes
46 c		
46 c 47	Terrorist financing	Yes
47	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes
47 48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
47 48 48 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes
48 48 a 48 a 1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes Yes
48 48 a 48 a 48 a1 48 b 48 b1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes
47 48 48 a 48 a 48 a 1 48 b 48 b 1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes Yes Yes Yes Yes Yes
48 48 a 48 a 48 a1 48 b 48 b1 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Yes Yes Yes Yes Yes
48 48 a 48 a 48 a1 48 b 48 b1 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes
48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes
48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c 49 d	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficilitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFis Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes
48 a 48 a 1 48 b 48 b 1 49 a 49 b 49 c 49 d	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFis Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
47 48 a 48 a 48 a 48 b 48 b 49 a 49 b 49 c 49 d 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and ficilitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFis Prohibit dealing with other entitles that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes
48 48 a 48 a 48 a 1 48 b 48 b 1 49 a 49 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	Yes

49 I Define the process for excellating financial crome risks is excellational projectived by supplices such by dentified by several projectived by supplices such by dentified by several projectived by supplices such by dentified by several projectived by several projective by several projectiv			
terminating existing customer relationships due to financial crime risk. Define the process for existing clients for financial crime reasons that applies across the entity. Vering the process of existing clients for financial crime reasons that applies across the entity. Part of the process and candicia crime reasons the entity. Sanctionship Define the processes regarding screening for sanchida or financial crime reasons if they seek to re-establish a relationship or sanchida processes regarding screening for sanchida processes. Per an advantage very several crime reasons if they seek to re-establish a relationship or sanchida. Per an advantage very sanchida processes regarding screening for sanchida processes. Per an advantage very sanchida processes that internal valorities? The sanchida processes for the maintenance of internal valorities? Fits a the Entity defined a risk bolandary self-read processes. Per an advantage of the maintenance of internal valorities? Fits a the Entity defined a risk bolandary self-read processes. Per an advantage of the processes of the maintenance of internal valorities? Fits a lift, what is the releasion period? Fits the Entity what is the releasion period of the sanchida period	491		Yes
crime reasons fall applies across the entity, including foreigh pranches and affiliates and affi	49 J	terminating existing customer relationships due to	Yes
handle customers that were previously exited for financial crimer rasons (thry seek for restability a relationship) 49 m Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Regalive News 49 n Outline the processes for the ministenance of internal "vacicities" 50 Has the Entity defined a risk follarance atatament or similar document which defines a risk boundary around what bothines? 51 Does the Entity have record reflection procedures that comply with applicable teach? 52 a Iff., what all responses provided in the above Section are representative of all the LES branches 53 Confirm that all responses provided in the above Section are representative of all the LES branches 54 a Iff., cardy which quasitions the difference's relate to and the branchies that this applies to, 55 a Iff appropriate, provide any additional information/context to the answers in this section, 6. AML, CTF & SANCTIONS RISK ASSESSMENT 54 Dees the Entity's AML & CTF EWRA cover the Inherent risk components detailed below: 55 a Consensity AML & CTF EWRA cover the Inherent risk components detailed below: 56 a Consensity AML & CTF EWRA cover the Inherent risk components detailed below: 57 a Consensity AML & CTF EWRA cover the Inherent risk components detailed below: 58 a Francetion Screening you have been a component detailed below: 58 a Francetion Screening you have been a component detailed below: 58 a Francetion Screening you have been a component detailed below: 58 a Francetion Screening you have been a component detailed below: 59 a Francetion Screening you have been a component detailed below: 59 a Francetion Screening you have been provided in the last Year Component detailed below: 59 a Continue to the date when the last AML & CTF EWRA cover the Inherent risk components detailed below: 59 a Continue to the Component detailed below: 59 a Continue to	49 k	crime reasons that applies across the entity,	Yes
sanctions, PEPs and Adverse Midal/Negative News 9 n	491	handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes
Internal valachilats* On Hash Entity defined a risk tolerance statement or similar document which defines a risk boundary around wher business? Obes the Entity have record retention procedures that comply with applicable lawa? If y, what is the retention period? If y, what is the retention period? Section are representative of all the LES branches school are representative of all the LES branches school are representative of all the LES branches school are representative of all the LES branches and the branches that this applies to. If Appropriate, provide any additional information to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the branches to the enswers in this section. If appropriate, provide any additional information and the provide any additional information and the provide any additional information and the provide and the provide and the provide and the provide any additional information and the provide and the provide any additional information and the provide and the provide and the provide any additional information and the provide and the provide and the provide and the provide and the last 12 months? If any additional and the provide a	49 m		Yes
similar document which defines a risk boundary around bear business? 51 a Coes the Entity have record retention procedures that comply with applicable lawa? 51 a JFY, what is the retention period? 52 Confirm that all responses provided in the above Section are representative of all the LES branches Section are representative of all the LES branches and the branches that this applies to. 52 a JFN, clarify which questions the difference's relate to and the branches that this applies to. 53 a Happropriate, provide any additional information content to the enswers in this section. 6.AML, OTF & SANCTIONS RISK ASSESSMENT 54 Dees the Entity's AML & OTF EWRA cover the inherent risk components detailed below: 54 a Cilient Ves 54 a Cilient Ves 55 a Transaction Mominion Ves 55 c Obes the Entity's Components detailed below: 55 a Transaction Mominion Ves 56 a Transaction Mominion Ves 57 a Training and Education Ves 58 a Management Information 79 a Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: 79 a Dees the Entity's Sanctions EWRA cover the inherent risk components detailed below: 79 a Clean Product Ves 58 a JFM and the American Ves 59 a Command Television Ves 50 a Command Television Ves 50 a Transaction Screening against Adverse Media/Negative Ves 51 a Training and Education Ves 52 a Clean Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 a Clean Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 a Customer Due Diligance 79 a Clean Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 68 a Customer Due Diligance 79 b Ses the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 79 b Counter Due Diligance 70 control EWRA cover the controls effectiveness components detailed below: 70 control EWRA cover the controls effectiveness components detailed belo	49 n		Yes
comply with applicable laws? If Y, what is the retention period? Syears or more Syears or more Syears or more Section are expresentative of all the LE's branches If Y, fairly which questions the difference's relate to and the branch'es that this applies to the answers in this section. If Appropriate, provide any additional informationicontaxi to the answers in this section. AMILY OTE & SANCTIONS RISK ASSESSMENT Solvent of the section of the se	50	similar document which defines a risk boundary	Yes
Syears or more S2 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a If N, clarity which questions the difference/is relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. SAML; CTF & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CTF EWRA cover the inherent risks components detailed below: 54 a Client Yes 54 c Channel Yes 55 C PEP Identification Monitoring Yes 55 b Customer Due Dilgence Yes 55 c PEP Identification Yes 56 d Transaction Screening Against Adverse Media/Negative, News 56 f Training and Education Yes 57 a Client Yes 58 a Iff N, provide the date when the last AML & CTF 57 b Product Yes 58 a Client Yes 59 c Customer Due Dilgence Yes 59 c Customer Due Dilgence Yes 50 Geography Yes 51 Client Yes 52 a Client Yes 53 G Training and Education Yes 54 d Training and Education Yes 55 d Training and Education Yes 56 d Training and Education Yes 57 a Client Yes 58 a Client Yes 59 Governance Yes 50 Geography Yes 50 Customer Due Dilgence Yes 51 C Channel Yes 52 C Lient Yes 53 C Customer Due Dilgence Yes 54 C Channel Yes 55 C Customer Due Dilgence Yes 56 C Customer Due Dilgence Yes 57 C Channel Yes 58 C Customer Due Dilgence Yes 59 C Customer Due Dilgence Yes 50 Customer Due Dilgence Yes 51 C Lient Yes 52 C Lient Yes 53 C Lient Yes 54 C Channel Yes 55 C Lient Yes 56 C Lient Yes 57 C Cohannel Yes 58 C Due of the Entity's Sanctions EWRA cover the inherent risk components detailed below: Yes 58 C Lient Yes 59 C Lient Yes 50 C Lient Yes 50 C Lient Yes 51 C Lient Yes 52 C Lient Yes 53 C Lient Yes 54 C Lient Yes 55 C Lient Yes 56 C Lient Yes 57 Lient Lient Yes 58 C Lient Yes 58 C Lient Yes 59 C Lient Yes 50 C Lient Yes 50 C Lient Yes 51 Lient Yes 52 C Lient Yes 53 C Lient Yes 54 C Lient Yes 55 C Lient Yes 56 C Lient Yes 57 C Lient Yes 58 C Lient Yes 58 C Lient Yes 59 C Lient Yes 50 C Lient Yes 50 C L	51		Yes
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55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed. 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes		News	Yes
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	LEO L		165
58 d Management Information Yes		Governance	Yes
	58 c	Governance List Management	Yes

58 e	Name Screening	Type
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes Yes
59	Has the Entity's Sanctions EWRA been completed in	Tes
	the last 12 months?	Yes
59 а	If N, provide the date when the last Sanctions EWRA was completed.	1
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N. clarify which questions the difference/s relate to and the branch/es that this applies to.	/
61	If appropriate, provide any additional information/context to the answers in this section.	
7.KYC	CDD and EDD	THE SAME WAS ASSESSED. THE SAME WAS A STORY OF THE SAME WAS A SAME
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following Identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes 25%
67	applied to beneficial ownership identification? Does the due diligence process result in customers	Yes
67 a	receiving a risk classification? If Y, what factors/criteria are used to determine the	
67 - 4	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2 67 a3	Geography	Yes
67 a4	Business Type/Industry Legal Entity type	Yes
67 a5	Adverse Information	Yes Yes
67 a6	Other (specify)	Establishing business relationship without physical presence of the client (non-face-to-face); Status of the official, close family member or close associate of the official; Presence of the offshore company in the ownership structure of the client.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	Banca Intesa ad Beograd may carry out on-site inspection through in-depth enquiries with the relevant contact persons of the customer/account-holder.
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 84	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	CDD periodic review: 12 months for high risk clients, 18 months for medium risk, 48 months for medium-low risk range. For clients that are financial institutions: 12 months for high and medium-high risk levels, 24 months for medium-low risk level, 36 months for low risk level.
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Restricted
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e		
	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entitles	Restricted
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	EDD on risk-based approach
76]	Non-Government Organizations	
	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	No EDD/restriction or prohibition
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	Business activities related to construction works and real-estate business are under EDD on a risbased approach.
77	If restricted, provide details of the restriction	Restrictions are based on limitations in terms of availability of some products, services and/or transactions. Additional explanations: 76a: restrictions are determined by the Parent bank (Intest Sanpaolo SpA), EU headquartered; 76g: allowed only if clearly proven and confirmed that the purpose is strictly medical;
78	Does EDD require senior business management and/ or compliance approvat?	Yes

78 a	If Y indicate who provides the annual	D-it.
76 a 79	If Y indicate who provides the approval: Does the Entity have specific procedures for	Bolh
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	Comments to the above answers: 76h): through the money transfer operator it is only possible to receive money, 76e); avoid to perform online gambling. 76m); PSPs are subject of EDD unless if obligors under the Serbian AMUCFT Law. 78a); all high risk clients have to be approved by AML Office of Banca Inlesa ad Beograd, and some of them also needs the approval of EB member.
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	In addition to the automated method for monitoring, manual monitoring is performed to cash transactions in amounts above the predefined limit (in scope of checking how the origin of money is determined and documented).
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	SymphonyAl Net Reveal; Norkom Delica (BAE Systems);
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	,
91	If appropriate, provide any additional information/context to the answers in this section.	,
O DAVI	ENT TRANSPARENCY	
9. PATMI 92	Does the Entity adhere to the Wolfsberg Group	U Verro Exced (E., 100 III. (May V. L.) Toper III. 1110. Nei teki Hakeliki
	Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law on the Prevention of Money Laundering and the Financing of Terrorism and associated by laws (Republic of Serbia)
93 с	If N, explain	I
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	1
97	If appropriate, provide any additional information/context to the answers in this section.	1
10. SANC	TIONS	(CONTROL OF CONTROL OF THE CONTROL O
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with senctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate senctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	World-Check by LSEG (ex Refinitiv) using Norkom technologies and Netreveal
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	Other
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	

Select the Sancions Lies used by the Entity in its sanctions screening processes: 105 a Consolidated United Nations Security Council Sancians Lies (UN) 106 b United States Department of the Treasury's Office of Foreign Assets Control (CPAC) 106 c Office of Financial Sancions implementation HMT 107 (CPS1) 108 c Lies maintained by other G7 member countries 108 d Lies maintained by other G7 member countries 108 d Lies maintained by other G7 member countries 109 c Officer (specify) 109 c When regulatory authorities make updates to their Sancions implementation HMT 107 when regulatory authorities make updates to their Sancions till the When regulatory authorities make updates to their Sancions till, how many business days before the entity updates their active memory of their entities of their ent	
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Foreign Assets Control (GFAC) 6 Cinca of Financial Sanctions Implementation HMT (GFS) 108 d European Union Consolidated List (EU) 108 c Lists maintained by other G7 member countries 108 f Lists maintained by other G7 member countries 108 f Lists maintained by other G7 member countries 109 f Lists maintained by other G7 member countries 109 f Lists maintained by other G7 member countries 100 f Lists maintained by other G7 member	actional data
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Description	actional data
Inleand lists provided by the Parent bank (Inleas Sanpaelo SpA), including PEF internal list of Banca Inleas Beograd according local regulation. When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against. 107 a Customer Data Same day to 2 business days 108 Does the Entity have a physical presence, e.g., branches, substidiaries, or representative offices located in countries/regions against with UN, OFAC, OF3I, EU or 67 member countries have enacted comprehensive puriedicion-based Sanctions? 109 Confirm that all responses provided in the above Section are representative of eith the Les branches III/N, clarify which questions the difference/s relate to and the branch/es that this applies to. 109 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 101 If appropriate, provide any additional information/context to the enswers in this section. 102 a2: Effectiveness test: < 1 year, Completeness test: activity in progress. 111. TRAINING & EDUCATION 111	
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Does the Entity provide customised training for AML, CTF and Sanctions staff? Yes	
114 a If V how fraguently is training delivered?	
114 a II 1, flow frequently is dailing delivered? Militality	
115 Confirm that all responses provided in the above	
Section are representative of all the LE's branches Yes	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	Comments for 112e) and 112f): N/A since Banca Intesa Beograd did not outsource its FCC activities to the third parties (legal entitles, non-employed workers).
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	On a half-yearly period, AML Office of Banca Intesa ad Beograd conducts quality assurance and compliance testing by performing 2nd level controls, defined and designed according to standards of the Parent Bank (Intesa Sanpaolo SpA).
13. AUDIT	A STATE OF STREET STATE OF	na Viologie i stanie vojeko se postava koji w projekte i ne s
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	THE SUMMERS OF SECTION
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance	Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies	Yes
123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 g	Technology	Yes
123 i	Transaction Monitoring	Yes Yes
123	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
1231	Other (specify)	1
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	1
14. FRAL	ID at the work of the last of	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
BANCA IN every effort	t to remain in full compliance with all applicable financial crime law	I Crimes Compliance OR equivalent) tion name) is fully committed to the fight against financial crime and makes rs, regulations and standards in all of the jurisdictions in which it does business and holds accounts, ive and sustainable controls to combat financial crime in order to protect its reputation and to meet its
standards. The Financ	•	ng parties to transactions in international payments and has adopted/is committed to adopting these by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months.
	cial Institution commits to file accurate supplemental information o	
	D MRVALJEVIĆ (Global Head is provided in this Wolfsberg CBDDQ are complete and correct to	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that o my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
	VUKOVIC (MLRO or eq CBDDQ are complete and correct to my honest belief, and that I	uivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
Ì	13.17.20/Signature & De	ote)
13.17. 20 (Signature & Date) An Unworld 13.12. 102 (Signature & Date)		