the Wolfsberg Group

Financial Institution	Mama

"ForteBank" JSC

Location (Country):

Republic of Kazakhstan

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
1. ENT	ITY & OWNERSHIP	
	Full Legal Name	ForteBank Joint Stock Company
2	Append a list of foreign branches which are covered by this questionnaire	No foreign branches. The list of domestic brances: Almaty, Astana, Aktau, Aktobe, Atyrau, Karaganda, Kaskelen, Kokshetau, Kostanai, Kyzylorda, Pavlodar, Petropavlovsk, Semey, Taldykorgan, Taraz, Uralsk, Ust-Kamenogorsk, Shymkent, Ekibastuz, Turkestan.
	Full Legal (Registered) Address	bldg. 8/1, Dostyk str., Yessil district, Astana city, Z05P1P0/010017, Republic of Kazakhstan
ı	Full Primary Business Address (if different from above)	bldg. 8/1, Dostyk str., Yessil district, Astana city, Z05P1P0/010017, Republic of Kazakhstan
5	Date of Entity incorporation/ establishment	Date of latest registration:10 February 2015 (date of first registration - 12 July 1999)
5	Select type of ownership and append an ownership chart if available	
a	Publicly Traded (25% of shares publicly traded)	No
5 a1	If Y, indicate the exchange traded on and ticker symbol	
i b	Member Owned/ Mutual	No
С	Government or State Owned by 25% or more	No
d	Privately Owned	Yes
3 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Bulat Utemuratov-80,11%
	% of the Entity's total shares composed of bearer shares	0%
	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
а	If Y, provide the name of the relevant branch/es which operate under an OBL	,
	Name of primary financial regulator / supervisory authority	Agency of regulation and development of the financial market of Republic of Kazakhstan

10	Provide Legal Entity Identifier (LEI) if available	
10	Provide Legal Entity Identifier (LEI) ii available	529900TH5WJ6KE8N8Z35
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A
12	Jurisdiction of licensing authority and regulator of ultimate parent	N/A
13	Select the business areas applicable to the Entity	·
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	N/A
14	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
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value;	
15 a	Number of employees	1001-5000
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	
		<u> </u>

	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	Yes
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	Yes
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17	Hold Mail	No
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	Yes
17 о	Sponsoring Private ATMs	No
17 р	Other high risk products and services identified by the Entity	new products and business practices;personal banking services;deposit transactions;trust management of property;brokerage services in International markets;custodian service;electronic money;prepaid payment cards;corporate payment cards;checks;accounts of foreign financial organizations;cash exchange transactions.
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	No No
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Correspondent banking and trade finance services (SWIFT messages) are processed only through the HQ of the LE.
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AML	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	Yes
19 b	Cash Reporting	Yes
19 с	CDD	Yes
19 d	EDD	Yes:
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	10-50
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Quarterly/Every three months
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

Hes the Entity accumented policies and procedures and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report between an entityrise wide	4. AN	I BRIBERY & CORRUPTION	
procedures considered with applicable ABC regulations and requirements to pleasenabily prevent, deloct and report bibbery and corruptions and requirements to pleasenabily prevent, deloct and report bibbery and corruptions. The process of the programme? 78	remega-variation causes		
regulations and requirements to [reasonaby] prevent, debet and report bibbry and corruption? 26 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 27 Hat the Entity appointed a designated officer or officers with sufficient experience/suspersise programme? 28 Does the Entity have adequate staff with appropriate levels of experience/suspersise to implement the ABC programme? 29 Is the Entity have adequate staff with appropriate levels of experience/suspersise to implement the ABC programme? 20 Is the Entity have a global ABC policy that: 20 Does the Entity have a global ABC policy that: 30 a Prohibits the giving and receiving of bribes? This includes promisting, offering, gliving, solicitation or receiving of surpting of value, which is a problem on the prohibit on spersion or receiving or happing of value, which is a problem of the debet of books and records (this may be within the ABC policy or any other policy applicable to the Leady of the debet of			
prevent, dated and report briboy and corruption? 26 Does the Entity have an enterprise vide programme that acts in minimum ABC standards? 27 Has the Entity appointed a designated officer or officers with sufficient experience/expertise or coordinating the ABC responsible for coordinating the ABC responsible for coordinating the ABC report of the supplementation of the supplement of the supplementation of the	l		Ves
corruption? Does the Entity have an enterprise vide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/sperise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/sperise to replace the Entity have adequate staff with appropriate levels of experience/sperise to replace the Entity have adequate staff with appropriate levels of experience/sperise to replace the Entity have a global ABC policy mineral to the ABC programme? Does the Entity have a global ABC policy between the ABC programme applicable to: Does the Entity have a global ABC policy between the Entity have a global ABC policy between the ABC programme? This includes promitting, offering, glying, solicitation or receiving of graviting of value, directly or indirectly, if improperly intended to influence action or obtain an edvantage intended to influence action or obtain an edvantage intended to influence action or obtain an edvantage intended to policy or any other policy applicable to the Legal Entity? The Section of the Entity between the Section of the Entity between the Section of the Entity between the Section of the			163
Does the Entity have an enterprise wide programme that acts minimum ABC standards? 1 has the Entity appointed a designated officer or officers with sufficient experience/seperities to programme? 2 Does the Entity have adequate staff with appointed lervise to experience/seperities to Implament the ABC programme? 2 Is the Entity's ABC programme applicable to: 30 Does the Entity have a global ABC policy that: 30 a Prohibits the giving and receiving of bribes? This includes promisting, offering, giving, solicitation or receiving of anything of value, directly of individual property intended to influence action or chest in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education of the public officials or influence action or totals in a education or influence action or totals in a education or influence action or influence action or totals in a education or influence action or public officials or influence action or influence and political controlled or influence ac			
programme that sets minimum ABC standards? If his the Entity applicate is designated officer or officers with sufficient experience/speries responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/speries to inplement the ABC programme? Prohibits the giving and receiving of bribes? This includes promisting, offering, giving, solicitation or receiving of anything of value, internation with public officials? This includes promisting, offering, giving, solicitation or evolving of anything of value, internation with public officials? The includes enhanced requirements regarding internation with public officials? Includes enhanced requirements regarding internation with public officials? Includes enhanced requirements regarding internation with public officials? Does the Entity have controls in place to maniform the effectiveness of their ABC programme? Does the Entity beard or Senior Management Commister receive regular Management Information on ABC matters? Does the Entity beard or Senior Management Information on ABC matters? Does the Entity park and Enterprise Wide ABC risk assessment? The senior of the effectiveness of their ABC programme? The Does the Entity park and Enterprise Wide ABC risk assessment? Does the Entity park and Enterprise Wide ABC risk assessment? The Commister receive regular Management Information on ABC matters? Does the Entity park and Enterprise Wide ABC risk assessment? The Commister receive regular management Commister the requency of the Entity park and Enterprise Wide ABC risk assessment? The Commister of the controls effectiveness and the thinvent in talesastemant? Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the thinvent risk associated with the countries for the programment and the first provides as appropriate to the programment and the first provides as appropriate to the programment of the controls effectiveness and the thinvent risk as	26		
Has the Entity appointed a designated officer or officers with untificient experience/			Yes
officers with sufficient experience/expertise responsible for coordinating the ABC programme? 28 Obes the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 29 Is the Entity have a global ABC policy that: 30 a Does the Entity have a global ABC policy that: 30 a Prohibits the giving and receiving of pribes? This includes promising, offening, giving, solicitation or receiving of anything of value, directly or inducely, if improperty intended to influence action or obtain an advantage 18 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) 30 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) 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity have controls in place to monitor in the effectiveness of their ABC programme? 33 Does the Entity parform an Enterprise Wide ABC first assessment? 42 Yes 33 If Y select the frequency 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inhorent risk assessment? 35 Does the Entity providers as appropriate 36 Does the Entity providers as appropriate 37 Potential liability created by intermediaries and other third-party providers as appropriate provider or through intermediaries 38 C Components detailed below: 39 Changes in business activities that may materially increase the Entity sorruption risk as accordinated with the contributions 40 Changes in business activities that may materially increase the Entity sorruption risk and the individerant third party providers and yes and the individerant third party providers and yes and the individerant the Entity sorruption risk and hospitally, hingrithernships, charitable donations and political controlled on the first party of the pr	27		
responsible for coordinating the ABC programme? 28 Obes the Entity have adequate staff with appropriate levels of experience/experties to implement the ABC programme applicable to: 29 Is the Entity have a global ABC policy that: 30 Does the Entity have a global ABC policy that: 30 Prohibits the giving and receiving of protect This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improparly inlended to influence action or poblish an advantage interaction with public officials? 30 b Includes enhanced requirements regarding interaction with public officials? 30 c Includes a prohibition against the fallification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity?) 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity Board of Senior Management Committee receive require Management Information on ABC matters? 33 Oces the Entity sear an Enterprise Wide ABC information and Entity profrom an Enterprise Wide ABC information on ABC matters? 34 Potential liability created by intermediaries and other third-party providers as appropriate the first perform of the providers as appropriate for through intermediaries 35 Does the Entity's ABC EWRA cover the inherent (ABC components detailed below: 36 Potential liability created by intermediaries and other third-party providers as appropriate for through intermediaries 37 Potential liability created by intermediaries and other third-party providers as appropriate for through intermediaries 38 C Compton risks associated with the countries and hospitality, hingrinternships, charitable donations and political contributions 39 C Changes in business activities that may matterfally increase the Entity's corruption risk and hospitality, hingrinternships, charitable donations and political contributions 39 C Does the Entity's corruption risk associated with gift as and hospitality, hingrinternshi	 		
programme? 28 Oces the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? 29 Is the Entity have a global ABC policy that: 30 a Oces the Entity have a global ABC policy that: 30 a Prohibits the giving and receiving of orbites? 30 in Chudes permisting, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperty intended to influence action or obtain an advantage 30 b Includes on prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 31 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)? 32 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 33 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 34 Does the Entity perform an Enterprise Wide ABC risk assessment? 35 ABC risk assessment? 36 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inhorent risk assessment? 36 Does the Entity providers as appropriate and industries in which the Entity does business, directly or through intermediaries 36 Compton risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 37 Changes in business activities that may materially increase the Entitys corruption risk and properts and properts and properts and properts that prover a Changes in business and the involve state-power ABC Policies and yes			Yes
28 Oces the Entity have adequate staff with appropriate levels of experience/experience to implement the ABC programme? 29 Is the Entity have a global ABC policy that: 30 Does the Entity have a global ABC policy that: 30 Prohibits the giving and receiving of bribas? This includes promitting, offening giving, solicitation or receiving of sarything of value, directly or indirectly, if improperly intended to influence action or obtains an advantage and includes onhanced requirements regarding interaction with public officials? 30 b Includes a prohibition against the falsification of books and records (tills may be within the ABC policy or any other policy applicable to the Legal Entity?) 31 Does the Entity have controls in place to moritor the effectiveness of the ABC programme? 32 Does the Entity so Board or Senior Management Information on ABC matters? 33 Does the Entity so Board or Senior Management Information on ABC matters? 34 Does the Entity have controls in place to moritor the effectiveness of the Entity experience matter encolve regular Management Information on ABC matters? 35 If Y select the frequency 36 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 37 Does the Entity so ABC EWRA cover the inherent risk components detailed bulow: 38 Potential liability created by intermediaries and other third-party providers as appropriate of the inherent risk components detailed bulow: 39 Components detailed with the countries and industries in which the Entity does business, directly in through intermediaries 39 Components detailed with the countries and industries in which the Entity does business, directly in through intermediaries 39 Components and political contributions 39 Components and political contributions 39 Components and political contrib			
appropriate levels of experience/expertise to implement the ABC programme? 29 Is the Entity's ABC programme applicable to: 30 Does the Entity have a global ABC policy that: 30 Prohibits the giving and receiving of bribas? This includes promisting, oftening, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an edvantage intended to policy or indirectly. If improperly intended to policy or indirectly, if improperly intended to influence action or obtain an edvantage intended to policy or indirectly. If improperly intended to policy or indirectly, if improperly intended to policy or indirectly intended to policy or indirectly applicable to the Legal Entity? 30 Combined to the Entity and the ABC programme? 31 Does the Entity's Board or Senior Management Committee receive required Management Yes 32 Does the Entity is Board or Senior Management Yes 33 If Y Select the frequency 34 Does the Entity have an ABC residual risk railing that is the net result of the controls effectiveness and the inherent risk assessment? 35 Obes the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Obes the Entity's ABC EWRA cover the inherent risk components detailed below: 37 Obes the Entity's Obes Description is the second of the risk of the product of the promise and the inherent risk accomponities and other third-party providers as appropriate of the promise of the product	20		
implement the ABC programme? In the Entity have a global ABC policy that: Does the Entity have a global ABC policy that: 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 interaction with public officials? Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Logal Entity)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Entity shave or Selor Management information on ABC matter? If y select the frequency ABC risk assessment? Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk seessment? Does the Entity shave it is necessary and the inherent risk seessment? Does the Entity sacrous dealed below: The residual risk and the controls effectiveness and the inherent risk components dealed below: The residual risk and the controls offectiveness and the inherent risk seessment? This inheritation are assessment? This includes prohibiting and receiving and the controls effectiveness and the inherent risk seessment? This includes prohibiting and receiving and the controls effectiveness and the inherent risk components dealed below: The residual risk of the controls effectiveness and the inherent risk components dealed below: The residual risk of the controls offectiveness and risk components dealed below: The residual risk of the controls offectiveness and risk components dealed below: The residual risk of the controls offectiveness and risk components dealed below: The residual risk of the control of the risk of the	20		l
29 Is the Entity's ABC programme applicable to: 30 Does the Entity have a global ABC policy that: 30 a Prohibits the giving and receiving of bribes? This includes promising, offering, giving, sollicitation or receiving of anything of value, directly or indirectly, if improperly intended to limitance action or votation and available of includes with anced requirements regarding the 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's Does the Entity's Board or Senior Management Committee receive regular Management Committee receive regular Management Committee receive regular Management Information on ABC matters? 33 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Oces the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Oces the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Oces the Entity of the controls of the control of the cont			Yes
Not Applicable Prohibits the giving and receiving of these. This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if Improperty intended to influence action or obtain an advantage 10 be includes unhanced requirements regarding interaction with public officials? 10 concludes a prohibition against the fistification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 11 Does the Entity have controls in place to monitor the affectiveness of their ABC programme? 12 Does the Entity bace and Section of Section and Section (Section Section S			
Does the Entity have a global ABC policy that: 30 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 30 b Includes enhanced requirements regarding interaction with public officials? 30 c Includes a prohibition against the flasification of books and records (film way be within the ABC policy or any other policy applicable to the Legal Entity?) 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity shoard or Senior Management Committee receive regular Management Information on ABC materia? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity have an ABC residual risk ratiu that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity have an ABC residual risk ratiu that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EVIKA cover the inherent risk components detailed below: 36 Potential liability created by intermediaries and other third-party providers as appropriate and other third-party providers as appropriate whose that involve state-owned or state-controled entities or public officials understand in the party of the controls and policial contributions when the provision and political contribution in the dependent third party revover ABC Politicies and formation and political contributions of the provision and political contri	29	Is the Entity's ABC programme applicable to:	Not Applicable
30 a Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if impropenty intended to influence action or obtain an advantage 30 b Includes enhanced requirements regarding interaction with public officials? 30 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)? 31 Oces the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? 33 Oces the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the Inherent risk assessment? 34 Oces the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the Inherent risk assessment? 35 a Potential liability created by intermediaries and other third-party providers as appropriate of the properties of the propert			INOLApplicable
This includes promising, offering, glying, solicitation or receiving of anything of value, directly or indirectly, if improperty intended to influence action or obtain an advantage of includes a prohibition gainst the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 30 c Includes a prohibition gainst the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 31 Does the Entity's book of Senior Management Committee receive regular Management Information on ABC matters? 32 Does the Entity's David or Senior Management Committee receive regular Management Information on ABC matters? 33 a If y select the frequency 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Ocruption risks associated with the countries and other third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries 36 Corruption risks associated with gifts and nospitally, hiring/internships, charitable donations and political contributions 37 Changes in business activities that may matterfally increase the Entity's corruption risk associated with gifts and negatively, hiring/internships, charitable donations and political contributions	30	Does the Entity have a global ABC policy that:	
This includes promising, offering, glying, solicitation or receiving of anything of value, directly or indirectly, if improperty intended to influence action or obtain an advantage of includes a prohibition gainst the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 30 c Includes a prohibition gainst the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 31 Does the Entity's book of Senior Management Committee receive regular Management Information on ABC matters? 32 Does the Entity's David or Senior Management Committee receive regular Management Information on ABC matters? 33 a If y select the frequency 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Ocruption risks associated with the countries and other third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries 36 Corruption risks associated with gifts and nospitally, hiring/internships, charitable donations and political contributions 37 Changes in business activities that may matterfally increase the Entity's corruption risk associated with gifts and negatively, hiring/internships, charitable donations and political contributions	l		
This includes promising, offering, glying, solicitation or receiving of anything of value, directly or indirectly, if improperty intended to influence action or obtain an advantage of includes a prohibition gainst the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 30 c Includes a prohibition gainst the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 31 Does the Entity's book of Senior Management Committee receive regular Management Information on ABC matters? 32 Does the Entity's David or Senior Management Committee receive regular Management Information on ABC matters? 33 a If y select the frequency 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Ocruption risks associated with the countries and other third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries 36 Corruption risks associated with gifts and nospitally, hiring/internships, charitable donations and political contributions 37 Changes in business activities that may matterfally increase the Entity's corruption risk associated with gifts and negatively, hiring/internships, charitable donations and political contributions	30 a	Prohibits the giving and receiving of bribes?	
solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage interaction with public officials? 30 c includes enhanced requirements regarding interaction with public officials? 31 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?) 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity soard or Senior Management Committee receive regular Management Committee receive regular Management Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity ABC EWRA cover the inherent risk components detailed below: 36 Potential liability created by intermediaries and other third-party providers as appropriate and the third-party providers as appropriate and the third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries and other third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries and controlled entities or public officials 36 C Transactions, products or services, including those that involve state-owned or state		This includes promising, offering, giving,	
directly or indirectly, if improperly intended to influence action or obtain an advantage 30 b Includes onhanced requirements regarding interaction with public officials? 30 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)? 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity beard or Senior Management Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Potential liability created by intermediaries and other third-party providers as appropriate and industries in which the Entity does business, directly or Inrough intermediaries 35 Carruption risks associated with the countries and industries in which the Entity does business, directly or Inrough intermediaries 35 Carruption risks associated with gifts and hospitally, hiring/internships, charitable donations and political contributions 36 Corruption risks associated with gifts and nospitally, hiring/internships, charitable donations and political contributions 36 Changes in business activities that may materially increase the Entity's corruption risk associated may cover ABC Policies and Vyss		solicitation or receiving of anything of value.	Yes
influence action or obtain an advantage 30 b Includes enhanced requirements regarding interaction with public officials? 31 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? 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 If Y select the frequency 36 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 37 Does the Entity of the controls effectiveness and the inherent risk assessment? 38 Potential liability created by intermediaries and other third-party providers as appropriate other third-party providers as appropriate and their third-party provider			165
Includes onhanced requirements regarding interaction with public officials? Yes			
interaction with public officials? 10 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)? 11 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 12 Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? 13 Does the Entity perform an Enterprise Wide ABC risk assessment? 13 Does the Entity perform an Enterprise Wide ABC risk assessment? 14 Months 15 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 15 Does the Entity's ABC EWFA cover the inherent risk components detailed below: 16 Polential liability created by intermediaries and other third-party providers as appropriate 17 Transactions, products or services, including those that involves tate-owned or state-controlled entities or public officials 18 Corruption risks associated with gifts and hospitality, hiringrimenships, charitable donations and political contributions materially increase the Entity's corruption risk 18 Corruption risks associated with gifts and hospitality, hiringrimenships, charitable donations and political contributions materially increase the Entity's corruption risk 18 Corruption risks associated with gifts and hospitality, hiringrimenships, charitable donations and political contributions materially increase the Entity's corruption risk materially increase the Entity's corruption risk entity increas	30 b	Includes enhanced requirements regarding	
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)? 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 33 Does the Entity favore and an	,		Yes
books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's abc EWRA cover the inherent risk components detailed below: 35 Does the Entity or through intermediaries and other third-party providers as appropriate 35 Corruption risks associated with the countries and undustries in which the Entity does business, directly or through intermediaries 35 Corruption risks associated with gifts and hospitality, Iniring/internships, charitable donations and political contributions 36 Corruption risks associated with gifts and hospitality, Iniring/internships, charitable donations and political contributions 36 Corruption risks associated with gifts and hospitality, Iniring/internships, charitable donations and political contributions 36 Corruption risks associated with gifts and hospitality, Iniring/internships, charitable donations and political contributions 36 Corruption risks associated with gifts and hospitality, Iniring/internships, charitable donations and political contributions may be a contributed on the property of the pro	30 c		
policy or any other policy applicable to the Legal Entity? 31 Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 32 Does the Entity Board or Senior Management Committee receive regular Management Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity perform an Enterprise Wide ABC risk assessment? 35 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 36 Does the Entity SABC EWRA cover the inherent risk components detailed below: 37 Does the Entity saccover the inherent risk components detailed below: 38 Potential liability created by intermediaries and other third-party providers as appropriate 39 Corruption risks associated with the countries and other third-party providers as appropriate 30 Corruption risks associated with gifts and hospitality, hingrintermships, charitable donations and political contributions 30 Corruption risks associated with gifts and hospitality, hingrintermships, charitable donations and political contributions 30 Corruption risks associated with gifts and hospitality, hingrintermships, charitable donations and political contributions 30 Corruption risks associated with gifts and hospitality, hingrintermships, charitable donations and political contributions 31 Corruption risks associated with gifts and hospitality hingrintermships, charitable donations and political contributions 32 Corruption risks associated with gifts and hospitality hingrintermships, charitable donations and political contributions hospitality hingrintermships, charitable donations and political contributions hospitality increase the Entity's corruption risk	000	hooks and records (this may be within the ABC	
Entity) Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? Does the Entity perform an Enterprise Wide ABC risk assessment? If y select the frequency If y select the frequence the find frequence frequen			Yes
Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? Does the Entity perform an Enterprise Wide ABC risk assessment? Ty select the frequency 12 Moniths Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Ty select the result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Ty select the requirement of the controls effectiveness and other third-party providers as appropriate Ty ses To plential liability created by intermediaries and other third-party providers as appropriate Ty ses To ransactions, products or services, including those that involve state-owned or state-controlled entities or public officials Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials To ransactions, products or services, including those that involve state-owned or state-controlled entities or public officials To ransactions and political contributions Yes To be the Entity increase the Entity's corruption risk and political contributions and polit			
the effectiveness of their ABC programme? Does the Entity's Board or Senior Management Information on ABC matters? Does the Entity perform an Enterprise Wide ABC risk assessment? If Y select the frequency If Y select the frequency If Y select the frequency Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Potential with the Entity does business, directly or through intermediaries and industries in which the Entity does business, directly or through intermediaries and industries in which the Entity does business, directly or through intermediaries and industries in which the Entity does does not be controlled entities or public officials to controlled entities or public officials of the Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk Does the Entity's corruption risk Does the Entity's corruption risk See Changes in business activities that may materially increase the Entity's corruption risk associated with gifts and hospitality, hiring/internships, charitable donations and political contributions on the independent thirid party cover ABC Policies and respective to the properties of the properties and political contributions on the independent thirid party cover ABC Policies and respective to the properties and prope	31		
32 Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 Does the Entity perform an Enterprise Wide ABC risk assessment? 35 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 36 Does the Entity's associated with the countries and other third-party providers as appropriate yes directly or through intermediaries directly or through intermediaries directly or through intermediaries and industries in which the Entity does business, directly or through intermediaries directly or through intermediaries and hospitality, hiring/internships, charitable donations and political contributions 35 Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 36 Does the Entity's corruption risk Yes 48	, ,	the effectiveness of their ABC programs 2	Yes
Committee receive regular Management Information on ABC matters? 32 Does the Entity perform an Enterprise Wide ABC risk assessment? 33 a If Y select the frequency 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 Does the Entity's reated by intermediaries and other third-party providers as appropriate 36 Does the Entity's internetiaries 37 Does the Entity's corruption risk associated with the countries and industries in which the Entity does business, directly or through intermediaries 36 Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 37 Does the Entity's internal audit function or other independent third party cover ABC Policies and least received the received	22		
Information on ABC matters? 33 Does the Entity perform an Enterprise Wide ABC risk assessment? 34 If Y select the frequency 35 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 36 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 37 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 38 Potential liability created by intermediaries and other third-party providers as appropriate 39 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 38 C Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 38 C Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 39 C Changes in business activities that may materially increase the Entity's corruption risk 4 Pes 4 Pos 4 Pos 5 Polential liability created by intermediaries and other lindependent third party cover ABC Policies and results of the controls of the providers as appropriate and providers and providers and providers and providers as appropriate and providers and prov	32	Committee and the Board of Senior Management	
Does the Entity perform an Enterprise Wide ABC risk assessment? 12 Months 14 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 15 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 16 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 17 Does the Entity of the countries and other third-party providers as appropriate and industries in which the Entity does business, directly or through intermediaries 18 Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 18 Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 18 Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 18 Changes in business activities that may materially increase the Entity's corruption risk materially increase the Entity's corruption of the independent third party cover ABC Policies and provides			Yes
ABC risk assessment? If Y select the frequency Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Solution of the Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk materially increase the Entity's corruption risk materially increase the Entity's corruption or other independent third party cover ABC Policies and			
33 a If Y select the frequency 34 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 35 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 35 a Potential liability created by intermediaries and other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risk associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk materially increase the Entity's corruption risk possible and hospitality increase the Entity's corruption risk possible and possible entity's internal audit function or other independent third party cover ABC Policies and Pyes	33		Vos
Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: To be a potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Corruption risks associated with gifts and hospitality intergase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes			
Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Toes the Entity's ABC EWRA cover the inherent risk components detailed below: Toes the Entity's ABC EWRA cover the inherent risk components detailed below: Toes the Entity's ABC EWRA cover the inherent risk components detailed below: Toes the Entity's ABC EWRA cover the inherent risk components detailed below: Toes the Entity's created by intermediaries and other third-party providers as appropriate Yes Torruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-ountrolled entities or public officials Transactions, products or services, including those that involve state-ountrolled entities or public officials Torruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Toes the Entity's internal audit function or other independent third party cover ABC Policies and residuent third party cove	33 a	If Y select the frequency	12 Months
that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Torruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes			12 WORLD
and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Solution risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk and possible entity's corruption risk and rease the Entity's corruption or other independent third party cover ABC Policies and Yes	34	Does the Entity have an ABC residual risk rating	
and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Solution risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk and possible entity's corruption risk and rease the Entity's corruption or other independent third party cover ABC Policies and Yes		that is the net result of the controls effectiveness	No
risk components detailed below: 35 a Potential liability created by intermediaries and other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes		and the inherent risk assessment?	
risk components detailed below: 35 a Potential liability created by intermediaries and other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes	35	Does the Entity's ABC EWRA cover the inherent	
35 a Potential liability created by intermediaries and other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and			
other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes		,	
other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes			
other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes	25 -	Detential fiel lite	
35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes	งจ a	Potential liability created by intermediaries and	Yes
and industries in which the Entity does business, directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk materially increase the Entity's corruption or other independent third party cover ABC Policies and Yes			
directly or through intermediaries 35 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and	35 b	Corruption risks associated with the countries	
Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials To Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Changes in business activities that may materially increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and			Yes
those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and			
those that involve state-owned or state-controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes	35 с	Transactions, products or services, including	
controlled entities or public officials 35 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and		those that involve state-owned or state-	Yes
hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other Independent third party cover ABC Policies and			
hospitality, hiring/internships, charitable donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other Independent third party cover ABC Policies and	35 d	Corruption risks associated with gifts and	
donations and political contributions 35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes			Yes
35 e Changes in business activities that may materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes			100
materially increase the Entity's corruption risk 36 Does the Entity's internal audit function or other Independent third party cover ABC Policies and Yes	35 e		
36 Does the Entity's internal audit function or other independent third party cover ABC Policies and Yes			Yes
Independent third party cover ABC Policies and Yes	36		
	-0	independent third party ABO B.	
l rocentes:			Yes
		r toceutres?	

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

CTF & SANCTIONS POLICIES & PROCE Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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
procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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 Yes
& Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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 Yes
reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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? EU Standards If Y, does the Entity retain a record of the results? ED Standards If Y, does the Entity retain a record of the results? ET Cooper 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 Yes
Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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 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 Yes
Sanctions violations Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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 retain a record of the results? Tooles 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
Are the Entity's policies and procedures updated at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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
at least annually? Are the Entity's policies and procedures gapped against/compared to: US 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
Are the Entity's policies and procedures gapped against/compared to: US 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 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
US 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
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
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
results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	
hat: Prohibit the opening and keeping of anonymous and fictitious named accounts	
and fictitious named accounts	
remark the opening and keeping of accounts for I	Yes
unlicensed banks and/or NBFIs	Yes
panking services to unlicensed banks	Yes
	Yes
services to shell banks	Yes
Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
Prohibit opening and keeping of accounts for	
igents, exchanges houses, casa de cambio,	Yes
oureaux de change or money transfer agents	
and foreign PEPs, including their family and	Yes
Define escalation processes for financial crime isk issues	Yes
erminating existing customer relationships due of financial crime risk	Yes
dentified by employees is to be escalated and investigated	Yes
Outline the processes regarding screening for	Yes ·
Outline the processes for the maintenance of	Yes
las the Entity defined a risk tolerance statement r similar document which defines a risk	Yes
oundary around their business?	
rocedures that comply with applicable laws?	Yes
Y, what is the retention period?	5 years or more
confirm that all responses provided in the above lection POLICIES & PROCEDURES are expresentative of all the LE's branches	Yes
N, clarify which questions the difference/s elate to and the branch/es that this applies to.	
appropriate, provide any additional information context to the answers in this section.	
	and fictitious named accounts Prohibit the opening and keeping of accounts for inlicensed banks and/or NBFIs Prohibit dealing with other entities that provide anking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for section 311 designated entities Prohibit opening and keeping of accounts for uny of unlicensed/unregulated remittance gents, exchanges houses, casa de cambio, sureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign PEPs, including their family and alose associates Define escalation processes for financial crime sk issues Define the process, where appropriate, for erminating existing customer relationships due to financial crime risk Define the processes, where appropriate and investigated Dutline the processes regarding screening for anctions, PEPs and negative media Dutline the processes for the maintenance of internal "watchlists" Las the Entity defined a risk tolerance statement or similar document which defines a risk oundary around their business? The Entity have a record retention procedures that comply with applicable laws? Y, what is the retention period? Light which questions the difference/s elate to and the branch/es that this applies to.

6. AML,	CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 с	Channel	Yes
50 d	Geography	Yes

51	Describe Front D. C. Furba	
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7 KYC	, CDD and EDD	
54	Does the Entity verify the identity of the	
	customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	N/A
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

Travers and the second	
If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
Product Usage	Yes
Geography	Yes
Business Type/Industry	Yes
Legal Entity type	Yes
Adverse Information	Yes
Other (specify)	N/A
Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
If Y, is this at:	
Onboarding	Yes
KYC renewal	Yes
Trigger event	Yes
What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
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
If Y, is this at:	
Onboarding	Yes
KYC renewal	Yes
Trigger event	Yes
What is the method used by the Entity to screen PEPs?	Combination of automated and manual
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
Does the Entity have a process to review and update customer information based on:	
KYC renewal	Yes
Trigger event	Yes
Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
	apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) Does the Entity have a risk based approach to screening customers for adverse media/negative news? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen for adverse media / negative news? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs? 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? Does the Entity have a process to review and update customer information based on: KYC renewal Trigger event Does the Entity maintain and report metrics on current and past periodic or trigger event due

70	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?	
70 a	Non-account customers	EDD on a risk based approach
70 b	Non-resident customers	EDD on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD on a risk based approach
70 j	Atomic power	EDD on a risk based approach
70 k	Extractive industries	EDD on a risk based approach
70 !	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	EDD on a risk based approach
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	Do not have this category of customer or industry
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	EDD on a risk based approach
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	N/A:
71	If restricted, provide details of the restriction	N/A
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	Some suspicious activities are monitored manually in compliance with scenarios of Financial Monitoring Agency
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

9. PAY	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	Law of Republic of Kazakhstan from August 28, 2009 No. 191 – IV "On Counteraction to legalization (laundering) of incomes received by illegal means, and terrorism financing" and other normative acts of Republic of Kazakhstan
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	
	1	

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy	
	approved by management regarding	
	compliance with sanctions law applicable to the	
	Entity, including with respect its business	Yes
	conducted with, or through accounts held at	
İ	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
١,,	other controls reasonably designed to prevent	
l		
	the use of another entity's accounts or services in a manner causing the other entity to violate	L.,
	sanctions prohibitions applicable to the other	Yes
ļ	entity (including prohibitions within the other	
1	entity's local jurisdiction)?	
88	Does the Entity have policies, procedures or	
00	other controls reasonably designed to prohibit	
	and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the	l.,
		Yes
1	resubmission and/or masking, of sanctions	
	relevant information in cross border transactions?	
89	Does the Entity screen its customers, including	
133	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	Yes
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
30	what is the method used by the Entity?	Combination of automated and manual
91	Does the Entity screen all sanctions relevant	
	data, including at a minimum, entity and location	
l	information, contained in cross border	Yes
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
-	Trinates the method daed by the Entity?	Combination of automated and manual
93	Select the Sanctions Lists used by the Entity in	
L	its sanctions screening processes;	
93 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 b	United States Department of the Treasury's	
	Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
93 с	Office of Financial Sanctions Implementation	
	HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	occurrence and content and beneficial owners and for littering transactional data
30,0	Lists maintained by other G7 member countries	Used for filtering transactional data
93 f	Other (specify)	
,	Cario, (opcomy)	
94		
V4	Question removed	
95	Whon regulators outhout?	
99	When regulatory authorities make updates to	
	their Sanctions list, how many business days	
	before the entity updates their active manual and/	
95 a	or automated screening systems against:	
∍J d	Customer Data	
		Same day to 2 business days
		Same say to a submices unys
95 b	Transactions	
	Transactions	
		Same day to 2 business days
		. 4

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

AINING & EDUCATION	
Does the Entity provide mandatory training, which includes :	
Identification and reporting of transactions to government authorities	Yes
laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
laundering, terrorist financing and sanctions violations	Yes
New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
Conduct and Culture	Yes
Is the above mandatory training provided to :	
Board and Senior Committee Management	Yes
1st Line of Defence	Yes
2nd Line of Defence	Yes
3rd Line of Defence	Yes
3rd parties to which specific FCC activities have been outsourced	Not Applicable
(contractors/consultants)	Yes
Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
	Does the Entity provide mandatory training, which includes: Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations Conduct and Culture Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence 3rd parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

12. QU	ALITY ASSURANCE /COMPLIANCE TEST	NG
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

Idition to inspections by the government rivisors/regulators, does the Entity have an nal audit function, a testing function or other bendent third party, or both, that assesses AML, CTF and Sanctions policies and lices on a regular basis? often is the Entity audited on its AML, CTF notions programme by the following: nal Audit Department mal Third Party is the internal audit function or other bendent third party cover the following: cTF & Sanctions policy and procedures / CDD / EDD and underlying odologies saction Monitoring saction Screening including for sanctions e Screening & List Management ing & Education nology	Yearly Component based reviews Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
nctions programme by the following: nal Audit Department real Third Party is the internal audit function or other bendent third party cover the following s: . CTF & Sanctions policy and procedures / CDD / EDD and underlying odologies saction Monitoring saction Screening including for sanctions be Screening & List Management ing & Education	Component based reviews Yes Yes Yes Yes Yes Yes Yes
the internal audit function or other bendent third party cover the following s: , CTF & Sanctions policy and procedures / CDD / EDD and underlying odologies saction Monitoring saction Screening including for sanctions e Screening & List Management ing & Education	Component based reviews Yes Yes Yes Yes Yes Yes Yes
the internal audit function or other pendent third party cover the following s: CTF & Sanctions policy and procedures / CDD / EDD and underlying odologies saction Monitoring saction Screening including for sanctions e Screening & List Management ing & Education	Yes Yes Yes Yes Yes Yes Yes
pendent third party cover the following st. CTF & Sanctions policy and procedures / CDD / EDD and underlying odologies saction Monitoring saction Screening including for sanctions e Screening & List Management ing & Education	Yes Yes Yes Yes Yes
/ CDD / EDD and underlying odologies saction Monitoring saction Screening including for sanctions e Screening & List Management ing & Education	Yes Yes Yes Yes Yes
odologies saction Monitoring saction Screening including for sanctions e Screening & List Management ing & Education	Yes Yes Yes Yes
saction Screening including for sanctions e Screening & List Management ing & Education	Yes Yes Yes
e Screening & List Management	Yes Yes
ing & Education	Yes
· ·	
nology	Yes
mance	Yes
rting/Metrics & Management Information	Yes
icious Activity Filing	Yes
prise Wide Risk Assessment	Yes
r (specify)	N/A
dverse findings from internal & external tracked to completion and assessed for uacy and completeness?	Yes
rm that all responses provided in the above on, AUDIT are representative of all the LE's thes	Yes
clarify which questions the difference/s to and the branch/es that this applies to.	
u n oi it	acy and completeness? In that all responses provided in the above In, AUDIT are representative of all the LE's Items It

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

(Financial Institution name) is fully committed to the fight against financial crime and makes

every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.

Dauirzhan Augambay

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial

Birzhan Nazhmidenov

Institution.

Birzhan Nazhmidenov (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

July 17, 2013 (Signature & Date)

whey 12 2023 (Signature & Date)