the Wolfsberg Group

Financial Institution Name: ELocation (Country):

NDIA	

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. ENTIT	Y & OWNERSHIP	
1	Full Legal Name	BANK OF INDIA
2	Append a list of foreign branches which are covered by this questionnaire	Singapore, Ho Chi Minh City, Tokyo, Osaka, Hong Kong, London, Birmingham, Leicester, Wembley, Paris, antwerp, Glasgow, Nairobi, Industrial Area Kenya, Westlands, Mombasa, Eldoret, Dubai, New York, San Francisco, Cayman Islands, (IBU) Gift City.
3	Full Legal (Registered) Address	BANK OF INDIA, STAR HOUSE, C-5, G-BLOCK, BANDRA KURLA COMPLEX, BANDRA (EAST). MUMBAI - 400051, MAHARASHTRA, INDIA
4	Full Primary Business Address (if different from above)	SAME AS ABOVE
5	Date of Entity incorporation/establishment	17/09/1906
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BSE AND NSE 532149 AND BANKINDIA
6 b	Member Owned/Mutual	No V
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No v
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	NIL
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Yes ▼
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Cayman islands branch and IBU Gift City Branch
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No 🔻
10	Name of primary financial regulator/supervisory authority	RESERVE BANK OF INDIA
11	Provide Legal Entity Identifier (LEI) if available	21380058KMSRJIL8C294
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	NA .



13	Jurisdiction of licensing authority and regulator of ultimate parent	INDIA
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Van
14 b	Private Banking	Yes Do
14 c	Commercial Banking	<u> </u>
14 d		Yes
-	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	Yes C C C C C C C C C C C C C C C C C C C
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No .
15 a	If Y, provide the top five countries where the non- resident customers are located,	NA L
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	
17		Greater than \$500 million
17	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA .
18	If appropriate, provide any additional information/context to the answers in this section.	NA .
	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
10 015		
19 alb	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1b 19 a1c		No Yes
	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes Yes
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes Yes No
19 a1c 19 a1d 19 a1e 19 a1f 19 a1f	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes No Yes
19 a1c 19 a1d 9 a1e 9 a1f 9 a1f 9 a1h	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes No Yes No
19 a1c 19 a1d 19 a1e 19 a1f	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	Yes Yes No Yes





19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
401	III. MARKATAN AND TO THE WATER	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
200000000000000000000000000000000000000	Domestic Bulk Cash Delivery	No Land
19 e	Hold Mail	Yes
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No 🗔
19 k	Remote Deposit Capture (RDC)	No E
191	Sponsoring Private ATMs	No —
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	
19 0	Virtual Assets	Yes No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	No
19 p1	Check cashing service	
19 p1a		Yes
19 p1a	If yes, state the applicable level of due diligence Wire transfers	Identification and verification
19 p2 19 p2a		Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
19 p3 19 p3a	Foreign currency conversion If yes, state the applicable level of due diligence	Yes
19 p3a		Identification and verification
19 p4 19 p4a	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	Identification and verification
19 p3	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	NA NA
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA .
21	If appropriate, provide any additional information/context to the answers in this section.	
3 AMI C	TE & SANCTIONS DROCDAMME	
3. AML, C	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes
22 22 a	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes Yes
22 22 a 22 b	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes
22 a 22 b 22 c	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership	Yes Yes
22 a 22 a 22 b 22 c 22 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 a 22 b 22 c 22 d 22 e	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
22 a 22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
22 a 22 b 22 c 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes





22 m	Suspicious Activity Reporting	Yes	[
22 n	Training and Education	Yes	
22 o	Transaction Monitoring	Yes	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100	•
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	·
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	*
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	¥
26 a	If Y, provide further details		Laurence Control
27	Done the coffe have a which the		
28	Does the entity have a whistleblower policy? Confirm that all responses provided in the above	Yes Yes	
28 a	Section 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.	NA .	
29	If appropriate, provide any additional information/context to the answers in this section.	Overseas branches have to follow stringent rules and regulations of local regulator and home country regulator.	
4. ANTI	BRIBERY & CORRUPTION		400
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	-
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	Ţ
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	v
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	-
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	¥
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	•
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	-
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	V
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	Ŧ
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	-
38 a	If N, provide the date when the last ABC EWRA was completed.	NA L	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	•
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	v
40 a	Potential liability created by intermediaries and	Yes	=



CRODQ V1.4

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	¥
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	¥
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	*
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	•
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	~
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	
42 b	1st Line of Defence	Yes	
42 c	2nd Line of Defence	Yes	
42 d	3rd Line of Defence		
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes	-
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	V
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	-
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	V
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA	
45	If appropriate, provide any additional information/context to the answers in this section.	-	
E ANAL (CTE & CANCELONS DOLLGIES & PROCEDURES		
-	CTF & SANCTIONS POLICIES & PROCEDURES		10.8
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	1
46 b	Terrorist financing	Yes	_
46 c	Sanctions violations	Yes	-
47	Are the Entity's policies and procedures updated at least annually?	Yes	
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	74147-0-2
48 a1	If Y, does the Entity retain a record of the results?	Yes	
48 b	EU Standards	Yes	-
48 b1	If Y, does the Entity retain a record of the results?	Yes	_
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	-
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	-
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	V
49 d	Prohibit accounts/relationships with shell banks	Yes	
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	-
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	





Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 4 a Client Yes [54 b Product Yes] 5 b Product Yes [55 c Channel Yes] 5 c Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 5 a Transaction Monitoring Yes [55 c PEP Identification Yes] 5 b Customer Due Diligence Yes [56 c PEP Identification Yes] 5 c PEP Identification Yes [57 c PEP Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c PEP Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [56 c PEP Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [57 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [57 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening Adverse Media/Negative News Yes] 5 c Commance Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes]				
Vernimating existing customer relationships due to femanical crime risk. Define the process for oxiting clients for financial crime risk. Ves.	100000	issues/potentially suspicious activity identified by employees		
crime reasons that applies across the entity, including foreign transces and affiliates 49 I Define the processes and control to identify and handle customers that were proviously evided for financial crime reasons if they seek to re-establish a relationship 49 Im Custine the processes regarding screening for such that the control is the control is the control in the control is the control in the control is the control in the control in the control in the control is the control in the control in the control in the control is the control in the control i	49 j	terminating existing customer relationships due to	Yes	V
handle customers that were previously exited for francal crimer reasons if they seek for restablish a relationship in the processes regarding screening for sanctions, PEPs and Adverse MedianNogative News 149 m. Outline the processes for the maintenance of internal "watchiets" or the watchiets or the maintenance of internal "watchiets" or the watchiets or the maintenance of internal "watchiets" or the watchiets or the maintenance of internal "watchiets" or the watchiets or the processes of the maintenance of internal "watchiets" or the watchiets or the processes or more of the watchiets of the processes or more of the watchiets of the processes or more of the watchiets of the watchiets or the maintenance or the watchiets or the watc	49 k	crime reasons that applies across the entity,	Yes	-
sanctions, PEPs and Ariverse MedianNegative Neve 19 n	491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a	a Yes	
internal "wachinists" 3	49 m		ys Yes	Luiud
similar document which defines a risk boundary around their business? 51 Dees the Entity have record retention procedures that comply with applicable leavs? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 If appropriate, provide any additional information/context to the answers in this section. 53 If appropriate, provide any additional information/context to the answers in this section. 54 Dess the Entity's AML & CIT EWRA cover the inherent risk components detailed below: 55 Dess the Entity's AML & CIT EWRA cover the controls official terms of the control official terms of the control official terms of the control of the co	49 n		Yes	
comply with applicable laws? If Y, what is the retention period? Syears or more 22 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a If N, danfy which questions the difference/s relate to and the branchies that this applies to. If appropriate, provide any additional information/context to the answers in this section. 53 If appropriate, provide any additional information/context to the answers in this section. 54 A Client 54 Client 55 Content of the section of th	50	similar document which defines a risk boundary	Yes	-
Syears or more Confirm that all responses provided in the above Section are representative of all the LES branches Section are representative of all the LES branches Section are representative of all the LES branches 3. If N, Carify which questions the difference/s relate to and the branchies that this applies to. If appropriate, provide any additional information/context to the answers in this section. SAML, CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EVFA cover the inherent rask components detailed below: 4. Client 4. Client 5. Channel 7. Yes 7. Cooks the Entity's AML & CTF EVFA cover the controls officiences components detailed below: 5. AU Transaction Monitoring 7. Yes 7. Transaction Monitoring 7. Yes 7. Transaction Screening 7. Transaction Screening 7. Yes 7. Transaction Screening 7. Yes 7.	51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	-
Section 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. If appropriate, provide any additional information/context to the answers in this section. 6. AML, CTF & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 54 a Client 54 Ceography 55 Does be Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring 55 Customer Due Diligence 55 c PEP Identification 55 c PEP Identification 55 c PEP Identification 55 c Name Screening against Adverse Media/Negative News 55 Transaction Monitoring 55 Governance 56 A Transaction Monitoring 57 Governance 58 A Transaction Monitoring 59 Governance 79 Ves 51 Transaction Monitoring 55 Covernance 79 Covernance 79 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 79 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 79 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 79 Covernance 79 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 79 Customer Due Diligence 79 Customer Due D	51 a	If Y, what is the retention period?	5 years or more	
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. 5. AML, CTF & SANCTIONS RISK ASSESSMENT 5. Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 5. 4 Does the Entity's AML & CTF EWRA cover the ontrols of footieveness components detailed below: 5. 4 Channel 5. 6 Does the Entity's AML & CTF EWRA cover the controls of footieveness components detailed below: 5. 5 Does the Entity's AML & CTF EWRA cover the controls of footieveness components detailed below: 5. 5 Does the Entity's AML & CTF EWRA cover the controls of footieveness components detailed below: 5. 6 PEP Identification 7 Ves 7 Transaction Monitoring 7 Ves 7 Transaction Screening 7 Ves 7 Transaction Screening 8 Ves 9 Transaction Screening 9 Ves 1 Transaction Screening 9 Ves 1 Transaction Screening 9 Ves 1 Transaction Screening 1 Ves 1 Transaction Screening 2 Ves 3 Governance 3 Ves 4 Ves 5 Transaction Screening 5 Overnance 5 Ves 5 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 5 Transaction Screening 5 C Channel 5 Ves 1 Condition 7 Ves 8 Covernance 9 Ves 9 Covernance 9 Ves 1 Condition 9 Ves 1	52		Yes	
information/context to the answers in this section. 6. AML_CTF & SANCTIONS RISK ASSESSMENT 54 Dees the Entity's AML & CTF EWRA cover the inherent risk components detailed below. 54 a Client Yes [55 Product Yes] 54 c Channel Yes [56 Caparaphy] 55 Does the Entity's AML & CTF EWRA cover the controls officitiveness components detailed below. 55 a Transaction Monitoring Yes [57 Caparaphy] 55 Customer Due Diligence Yes [58 Caparaphy] 55 Customer Due Diligence Yes [58 Caparaphy] 55 d Transaction Screening Yes [58 Caparaphy] 56 Name Screening against Adverse Media/Negative News [58 Caparaphy] 57 Italing and Education Yes [58 Caparaphy] 58 Management Information Yes [59 Caparaphy] 58 Management Information Yes [59 Caparaphy] 57 Does the Entity's Sanctions EWRA been completed in the last 12 months? 58 Caparaphy Yes [58 Caparaphy] 59 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 Customer Due Diligence Yes [58 Caparaphy] 59 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 59 Caparaphy Yes [58 Caparaphy] 59 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 59 Customer Due Diligence Yes [58 Caparaphy] 59 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 50 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 50 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 50 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 50 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 50 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	52 a	If N, clarify which questions the difference/s relate to	D NA	
Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 154 a Client Yes	53			
Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 4 a Client Yes [54 b Product Yes] 5 b Product Yes [55 c Channel Yes] 5 c Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 5 a Transaction Monitoring Yes [55 c PEP Identification Yes] 5 b Customer Due Diligence Yes [56 c PEP Identification Yes] 5 c PEP Identification Yes [57 c PEP Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c PEP Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [56 c PEP Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [57 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [57 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening against Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening Adverse Media/Negative News Yes [58 c Per Identification Yes] 5 c Name Screening Adverse Media/Negative News Yes] 5 c Commance Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c C Channel Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes] 5 c Customer Due Diligence Yes [70 c Per Identification Yes]	6. AML C	TE & SANCTIONS PISK ASSESSMENT		
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Tes				
58 d Management Information Yes				

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CBDDQ VI.4

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64 c 64 d 64 e	Nature of business/employment Ownership structure Product usage	Yes Yes	
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64 e	Product usage		
120000000000000000000000000000000000000		Yes	
015	Purpose and nature of relationship		and the same
64 f	r dipose dire riatere er relaterising	Yes	
64 g	Source of funds	Yes	
64 h	Source of wealth	Yes	
	Are each of the following identified:		
65 a	Ultimate beneficial ownership	Yes	
65 a1	Are ultimate beneficial owners verified?	Yes	
65 b	Authorised signatories (where applicable)	Yes	
65 c	Key controllers	Yes	
65 d	Other relevant parties	Yes	
8	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%	¥
	Does the due diligence process result in customers receiving a risk classification?	Yes	•
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1	Product Usage	Yes	
67 a2	Geography	Yes	
67 a3	Business Type/Industry	Yes	
67 a4	Legal Entity type	Yes	
67 a5 67 a6	Adverse Information Other (specify)	Yes	
	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	•
68 a	If Y, is this at:		
68 a1	Onboarding	Yes	
68 a2	KYC renewal	Yes	
68 a3	Trigger event	Yes	
68 a4	Other	No	
68 a4a	If yes, please specify "Other"		
s	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	_
69 a	If Y, is this at:	TORRESTANTANTO AND	LINE
69 a1 69 a2	Onboarding	Yes	





69 a3	Trigger event	Yes	T
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?		
71 a	If Y, is this at:		Luiu.
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Automated	[¥
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	-
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	
74 a	If yes, select all that apply:		
74 a1	Less than one year	Yes	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	
74 a4 74 a5	5 years or more	Yes	Lange Lange
74 a5	Trigger-based or perpetual monitoring reviews	Yes	
74 40	Other (Please specify)	-	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	-
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
76 a	Arms, defence, military	EDD on risk-based approach	
76 b	Respondent Banks	EDD on risk-based approach	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	-
76 c	Embassies/Consulates	EDD on risk-based approach	₹
76 d	Extractive industries	EDD on risk-based approach	
76 e	Gambling customers	Prohibited	<u> </u>
76 f	General Trading Companies	Always subject to EDD	
76 g	Marijuana-related Entities	Prohibited	
76 h	MSB/MVTS customers	EDD on risk-based approach	
76 i	Non-account customers	Always subject to EDD	NA NA
76 j		EDD on risk-based approach	
76 k	Non-resident customers		
761	N. I	EDD on risk-based approach	
76 m	D	Do not have this category of customer or industry	
76 n	DED-	EDD on risk-based approach	<u> </u>
76 o		EDD on risk-based approach	
76 p		EDD on risk-based approach	M
76 q		EDD on risk-based approach	
76 r		EDD on risk-based approach	
76 s		Prohibited	
76 t		EDD on risk-based approach	•
76 u		Prohibited	Y
76 v	****	Always subject to EDD	
	11-10 5 1	EDD on risk-based approach	M
76 w		Always subject to EDD	$\overline{\mathbf{v}}$
76 x 76 y	Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry	V
77	If restricted, provide details of the restriction	NA	
78	Does EDD require senior business management and/ or compliance approval?	Yes	-



Page 8

ENTERPRISE CRODO VI.4

PRINCE OF STREET CRODO VI.4

PRINCE OF STREET CRODO VI.4

PRINCE OF STREET CRODO VI.4

Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents? Does the Entity perform an additional control or quality review on clients subject to EDD? Confirm that all responses provided in the above Section 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 If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	70 -	I wytadat a a a ta water	
ontoparting entities that hand is client money such as a lawyer, accordants, contents, real estate agents? Does the Entity perform an additional control or quality review on circles subject in EDD? Confirm that all responses provided in the above bodies are representable to all the LES bearshes by the provided of the Confirm that all responses provided in the above bodies are representable to all the LES bearshes by the confirmation of the branches that applies to the analysis of the branches that applies to the analysis of the branches that applies to the analysis of the branches that the provided any additional enformation context to the analysis of the section. 8. MONITORING & REPORTING 3. Does the Entity have risk based policies, procedures and monitoring processes for the destification and reporting of suspicous activities? 4. What is the membod used by the Entity to monitor transactions for suspicious activities? 4. If it is membod used by the Entity to monitor transactions for suspicious activities? 4. If automated or combination selected, are informal system or vendo-founced tools used? 4. If automated or combination selected, are informal system or vendo-founced tools used? 4. If automated or combination selected, are informal system or vendo-founced tools used? 4. You have the automated Transaction Monitoring application sale cliebroid? 4. Your was the automated Transaction Monitoring application sale cliebroid? 5. Does the Entity have policies, procedures and processes to cereby, with suspicious transaction reporting requirements to report application sale cliebroid? 5. Does the Entity have policies, procedures and processes to review and escalation material resisting from the monitoring requirements to censure that complete, and for all the EED branches on the Entity have positions in a finity processes in place to processes in place to respond to Roquest For information (RFIs) from other entities in a finity provide any processes in place to respond to the combined of the EED branches	78 a	If Y indicate who provides the approval:	Senior business management
Does the Entity perform an additional control or quality review on criterians subject to EDD? 18 Confirm that all responses provided in the above Section are or propresentative of all the LES branches Section are or propresentative of all the LES branches Section are or propresentative of all the LES branches set of the another of all the LES branches set of the another of all the LES branches set of the another of all the LES branches set of the another of all the LES branches set of the another of all the LES branches set of the another	79	onboarding entities that handle client money such as	Yes
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91 If appropriate, provide any additional information/context to the answers in this section. 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group	90		Yes ▼
information/context to the answers in this section. 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group	90 a		NA .
92 Does the Entity adhere to the Wolfsberg Group	91		_
92 Does the Entity adhere to the Wolfsberg Group	9 PAVME	NT TRANSPARENCY	
You			
			Yes





93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	RBI Master Direction - Know Your Customer (KYC) Direction, 2016
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes ▼
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA
97	If appropriate, provide any additional information/context to the answers in this section.	-
10. SAN	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yas
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/lool?	Lexis Nexis; AMLOCK
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated

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105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	
106 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	
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	
106 f	Other (specify)		
107	When regulatory authorities make updates to their		
	Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
107 a	Customer Data	Same day to 2 business days	
107 b	Transactions	Same day to 2 business days	
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110	If appropriate, provide any additional information/context to the answers in this section.		
	ING & EDUCATION		
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	-
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	$\overline{\mathbf{v}}$
111 e	Conduct and Culture	Yes	
111 f	Fraud	Yes	
112	Is the above mandatory training provided to:		We had
112 a	Board and Senior Committee Management	Yes	
112 b	1st Line of Defence	Yes	
112 c	2nd Line of Defence	Yes	N.A.
112 d	3rd Line of Defence	Yes	
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	~
112 f	Non-employed workers (contractors/consultants)	Not applicable	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	J
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	T
114 a	If Y, how frequently is training delivered?	Annually	
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	V
		A	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	na
116	If appropriate, provide any additional	
	information/context to the answers in this section.	
12. QUAL	ITY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
118	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA
120	If appropriate, provide any additional information/context to the answers in this section.	Overseas branches have to follow stringent rules and regulations of local regulator and home country regulator.
		Southly regulator.
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes Yes
123 g	Suspicious Activity Filing	
123 h	Technology	Yes Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	па
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	na
26	If appropriate, provide any additional information/context to the answers in this section.	-
4. FRAU	D	
27	Does the Entity have policies in place addressing	Yes
28	Does the Entity have a dedicated team responsible	Yes
	Francis & detecting flands	

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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No V
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Foreign Branches have their own policies.
132	If appropriate, provide any additional information/context to the answers in this section.	NA NA
Wolfsberg G Declaration	ion Statement roup Correspondent Banking Due Diligence Questionnaire 2023 (CE Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial	ing or equivalent position holder AND Court Manual Land Court Manu
BANK OF II	NDIA (Financial I - 4% A)	
every effort	to remain in full compliance with all applicable financial crime laws	on name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
The Financii egal and reç	al Institution understands the critical importance of having effective gulatory obligations.	re and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financia standards.	al Institution recognises the importance of transparency regarding	g parties to transactions in international payments and has adopted/is committed to adopting these
The Financia The informat	al Institution further certifies it complies with / is working to comply ion provided in this Wolfsberg CBDDQ will be kept current and w	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.
	al Institution commits to file accurate supplemental information on	
	RISHNAN (Global Head of	Correspondent Banking or equivalent), certify that I have read and understood this declaration, that
he answers nstitution.	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
	NAGARAJAN (MLRO or equiv	ralent), certify that I have read and understood this declaration, that the answers provided in this mauthorised to execute this declaration on behalf of the Financial Institution.
		mathonactic execute his declaration on behalf of the Financial Institution.
	(Signature & Date	
	(Signature & Date	04.07.2024

