the Wolfsberg Group

Financial Institution Name: Location (Country) : THE BANK OF NAGOYALTD. 19-17, Nishiki 3-chome, Naka-Ku, Nagova-City, Aichi-Pref., Japan

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 atc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	red, client base etc.) is materially different than its Entity Head Office. Question	Answer
	Y & OWNERSHIP	
1. ENTIT	Full Legal Name	
15	ruii Legai Name	THE BANK OF NAGOYA,LTD.
2	Append a list of foreign branches which are covered by this questionnaire	NANTONG BRANCH (CHINA)
3	Full Legal (Registered) Address	19–17, Nishiki 3-chome, Naka-Ku, Nagoya-City, Aichi-Pref., Japan
4	Full Primary Business Address (if different from above)	same as above
5	Date of Entity incorporation/establishment	1949/12/6
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	Tokyo Stock Exchange 8522
6 b		No
6 c		No .
6 d	Privately Owned	No
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)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	no
	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	Financial Services Agency
11	Provide Legal Entity Identifier (LEI) if available	353800P9H4582TP8FA91
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	No
	Investment Banking	No
14 0		
14 c		Yes
14 c 14 f 14 g	Financial Markets Trading Securities Services/Custody	Yes
14 f	Financial Markets Trading	

14 i	Wealth Management	No
14 k	Other (please explain)	
17170	Other (please explain)	NONE
15	D	
10:	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	No
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non- resident customers are located.	N/A
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Greater bight 4000 million
	Section are representative of all the LE's branches	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	NONE
2. PROD	DUCTS & SERVICES	
19	Does the Entity offer the following products and	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream	
19 a1f	relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1f 19 a1g	Does the Entity have processes and	-
	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 Does the Entity allow downstream	
19 a1g	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	
19 a1g	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 Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment	

19 a1i		
	Does the Entity have processes and	
	procedures in place to identify downstream	
	relationships with MSBs /MVTSs/PSPs?	
75.7		No
19 b	Gross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No .
19 f	International Cash Letter	No
19 g	Low Price Securities	No
		No
19 h	Payable Through Accounts	340
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?	
	Third Party Payment Service Providers	
19 i2		
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	NONE
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 (Sponsoring Private ATMs	No
		No
19 m	Stored Value Instruments	
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 р	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:	
10 -1	Check cashing service	No
19 p1		
19 p1a	If yes, state the applicable level of due dilig	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due dilig	rence
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due dilig	rence
19 p4		No
	If yes, state the applicable level of due dilig	
19 p4a	If you offer other services to walk-in	erate.
19 р5	customers please provide more detail here, including describing the level of due diligence.	Domestic remittance - Due Diligence is conducted in accordance with regulatory requirements,
19 q	Other high-risk products and services identified by the Entity (please specify)	NONE
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.	
	Totale to and the standing of that and approve the	N/A
21	If appropriate, provide any additional information/context to the answers in this section,	NONE
	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME	NONE
	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	NONE
3. AML, 0 22	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
3. AML, 0 22 22 a	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes
3. AML, 0 22 22 a 22 b	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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 Yes
3. AML, 0 22 22 a	information/context to the answers in this section. CTF & SANCTIONS PROGRAMME 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 Yes
3. AML, C 22 22 a 22 b 22 c	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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 Yes
3. AML, 0 22 22 a 22 b 22 c 22 d	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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 Ownershio Cash Reporting	Yes Yes Yes Yas
3. AML, (22 22 a 22 b 22 c 22 c 22 d 22 e	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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 Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 c 22 d 22 e 22 f	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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
3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 f 22 f	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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 Yas Yas Yes Yes Yes Yes
3. AML, (22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 g	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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
3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 e 22 f 22 g 22 h	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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
3. AML, (22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 g	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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 Yes Yes Yas Yas Yes Yes Yes Yes Yes Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 e 22 f 22 g 22 h	information/context to the answers in this section, CTF & SANCTIONS PROGRAMME 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

Page 3

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML	Yes
	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	Yes
	Management Committee? If N, describe your practice in Question 29	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	W2
	components of its AML, CTF & Sanctions programme?	INO
26 a	If Y, provide further details	
		N1/A
		N/A
27 28	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above	Yes
28 a	Section are representative of all the LE's branches If N, clarify which questions the difference/s	
20 6	relate to and the branch/es that this applies to	
		N/A
29	If appropriate provide any additional	
20	If appropriate, provide any additional information/context to the answers in this section.	
	and the control of th	NONE
A Abirr	PRIBERY & CORPURTION	
30	BRIBERY & CORRUPTION Has the Entity documented policies and procedures	
30	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and report	Yes
2011	bribery and corruption?	
31	Does the Entity have an enterprise wide programme	Yes
32	that sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise	Yes
	responsible for coordinating the ABC programme?	165
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
34	programme?	
35	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Joint ventures
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or	Yes
	indirectly, if improperly intended to influence	
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
	Enucy/:	
36	Does the Entity have controls in place to monitor the	V
	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	Yes
20	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12	
	months?	Yes
70 -		
38 a	If N, provide the date when the last ABC EWRA was completed.	
	mas completed,	N/A
20	D	
39	Does the Entity have an ABC residual risk rating that	Von
	is the net result of the controls effectiveness and the inherent risk assessment?	i es
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and	Yes
40 ь	other third-party providers as appropriate Corruption risks associated with the countries and	
	industries in which the Entity does business.	Yes
	directly or through intermediaries	
40 c	Transactions, products or services, including	
	those that involve state-owned or state-	Yes
40 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable donations	Yes
	and political contributions	
40 e	Changes in business activities that may materially	Yes
10090	increase the Entity's corruption risk	
41	increase the Entity's corruption risk Does the Entity's internal audit function or other	Von
10090	increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and	Yes
41	increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to:	Yes
41 42 42 a	increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity grovide mandatory ABC training to: Board and senior Committee Management	Yes
41 42 42 a 42 b	increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management Ist Line of Defence	Yes Yes
41 42 42 a	increase the Entity's corruption risk Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? Does the Entity provide mandatory ABC training to: Board and senior Committee Management Ist Line of Defence 2nd Line of Defence	Yes

42 e	Third parties to which specific compliance activities subject to ABC risk have been	No
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	N/A
45	If appropriate, provide any additional information/context to the answers in this section.	NONE
5 AMI	CTF & SANCTIONS POLICIES & PROCEDURE	
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
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	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the	Not Applicable
48 b	EU Standards	No
48 b1	If Y does the Entity retain a record of the	Not Applicable
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 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 е	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	Yes

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risk issues/scientisty suspicious activity distantistable amplicates appropriate, for defent the process, where supropriate, for defent the process of exting clients for idea as, defent the process of exting clients for idea as, for the process of that applies across the entity, and the process of the process of exting clients for innered process of the process of	49 i	Define the process for escalating financial crime	
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Define the process for exiting clinicity for financial corner reasons that spalles across the certification of the control of	inia.	terminating existing customer relationships due to	Yes
crime reasons that applice across the entity, including forcins functions and affiliates. Perfinat the processe and controls to identify and for financial crime reasons if they seeply and for financial crime reasons if they seeply and for a sentinon. PEPs and Adverse Medis/Pleative and the processes regarding sorrening for sentinon. PEPs and Adverse Medis/Pleative and the processes for the maintenance of internal watchists. Performance of the processes for the maintenance of internal watchists. Performance of the first processes for the maintenance of internal watchists. Performance of the first processes for the maintenance of internal watchists. Performance of the first processes for the maintenance of internal watchists. Performance of the first processes for the maintenance of internal watchists. Performance of the first processes for the maintenance of internal watchists. Performance of the first processes of the processes of the processes of the first processe	40 h	Defeath for the first for the	
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Outline the processes regarding screening for sentions. PEPs and Adverse Medial, Nagative sentions. Peps and Nagative sentions. Pe			Yes
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sanctions. FPPs and Adverse Media/Negative 10 Outline the processor for the maintenance of internal "artichists" 10 Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary 11 Dees the Entity hare copy dependent on the complex with a solicible links? 12 I Py what is the retention period? 13 I Fy, what is the retention period? 14 I V, what is the retention period? 15 I J Fy what is the retention period? 15 I J Fy what is the retention period? 16 I N, clarify which questions the difference /s relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate to and the branch's that this applies to, relate the provide any additional information/contact to the answers in this section. 16 AML OTE & SANCTIONS RISK ASSESSMENT 17 Dees the Entity's AML & OTE FWRA cover the controls of floativeness components detailed below. 18 December 19 Decembe	49 m	Outline the processes regarding screening for	
49 n Outline the processes for the maintenance of internal "vate/hists" 50		sanctions, PEPs and Adverse Media/Negative	Yes
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Does the Entity have record retention procedures that complex with anolise laws? If Y, what is the retention period? Syears or more Quantity of the complex of the compl			Yes
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risk components detailed below: Client Yes Client Yes Freduct Yes Channel Yes Coustomer Due Diligence Yes Customer Due Diligence Yes	54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
risk components detailed below: Client Yes Client Yes Freduct Yes Channel Yes Coustomer Due Diligence Yes Customer Due Diligence Yes	54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
risk components detailed below: Client Yes Client Yes Freduct Yes Channel Yes Coustomer Due Diligence Yes Customer Due Diligence Yes	54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
risk components detailed below: 7 a Client Yes 7 b Product Yes 7 c Channel Yes 7 d Geography Yes 8 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 8 a Customer Due Diligence Yes 8 b Governance Yes 8 c List Management Yes	54 a 54 b 54 c 54 c 55 a 55 b 55 c 55 c 55 f 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
State	54 a 54 b 54 c 54 c 55 a 55 b 55 c 55 c 55 f 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 b Product Yes 57 c Channel Yes 57 d Geography 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 c 55 a 55 b 55 c 55 c 55 f 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 c Channel Yes 77 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 c 55 c 55 b 55 c 55 f 55 f 55 f 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 c 55 d 55 c 55 c 55 c 55 f 55 f 55 f 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 b 55 c 55 a 55 b 55 c d 55 c 55 f 55 d 55 c 6 56 a 57 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Dilisence Yes B Governance List Management Yes	54 a 54 a 54 b 54 c 554 c 554 d 555 c 555 a 555 c 555 d 555 c 556 d 557 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
effectiveness components detailed below: Se a Customer Due Diligence Yes Se b Governance Yes Se c List Management Yes	54 a 54 a 54 b 54 c 554 c 554 d 555 c 555 a 555 c 555 d 555 c 556 d 557 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
28 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 b 55 c 55 d 55 c 55 c 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 b 55 c 55 d 55 c 55 c 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 b 54 c 54 c 55 d 55 c 55 d 55 c 55 f 55 f 55 f 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Manacement Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
58 c List Management Yes	54 a 54 b 54 c 54 b 55 c 55 d 55 b 55 c 55 d 55 f 55 f 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
	54 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 c 55 c 55 d 55 c 55 f 55 c 55 f 55 c 55 f 55 c 55 f 55 c 55 d 55 e 55 f 55 d 55 e 55 f 55 d 55 e 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
Tes Ties	54 a 54 b 54 c 54 b 55 c 55 d 55 b 55 c 55 d 55 f 55 f 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
	54 a 54 b 54 c 54 d 55 c 55 d 55 b 55 f 55 f 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes

ro -	Name Secondary	Yes
58 e	Name Screening	Yes
58 f	Transaction Screening	
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
	the last 12 months?	
59 a	If N. provide the date when the last Sanctions	
	EWRA was completed,	
		N/A
60	Confirm that all responses provided in the above	
00	Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s	
ou a	relate to and the branch/es that this applies to	
	relate to and the branch/es that this applies to:	N/A
		IV/A
61	If appropriate, provide any additional	
	information/context to the answers in this section.	l
		NONE
7. KYC	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
30	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	
64	Which of the following does the Entity gather and	[D 1 D 2 D 3 D 4 D 4 D 4 D 5 D 4 D 5
	retain when conducting CDD? Select all that apply:	V
64 a	Gustomer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes.
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
	Ultimate beneficial ownership	Yes
65 a	Are ultimate beneficial owners verified?	Yes
65 a1	Authorised signatories (where applicable)	Yes
65 b		
65 c	Kev controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold	25%
	applied to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine	
	the customer's risk classification? Select all that	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
	Other (specify)	
67 a6	Other (specify)	
		NONE
		· · ·
	- 12.1 Col	
68	For high risk non-individual customers, is a site visit a	No
	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
		N/A
69	Does the Entity have a risk based approach to	
09	screening customers for Adverse Media/Negative	Yes
00 -		
69 a	If Y, is this at:	Yes
	1 O-baseding	
69 a1 69 a2	Onboarding KYC renewal	Yes

69 n3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
7.0	Adverse Media/Negative News?	Combination of automated and manual
71		
/1	Does the Entity have a risk based approach to	
	screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen	
0.000	PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs or controlled by	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		
74 -0	Less than one year	No .
74 a2	1 - 2 years	Yes
74 a3	3 - 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please specify)	1.02
	Other (Hease specify)	N/A
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due	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 Ы	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking	
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	EDD on risk-based approach
76 e		
	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Restricted
76 j	Nen-Coursement O-seriestics	
	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	Restricted
761	Nuclear power	Restricted
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
		EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	
76 v		EDD on risk-based approach
	Unregulated charities	EDD on risk-based approach
	Used Car Dealers	EDD on risk-based approach
76 w	OSCO ON Deplets	
76 x	Virtual Asset Service Providers	Always subject to EDD
	Virtual Asset Service Providers Other (specify)	Always subject to EDD N/A
76 x	Virtual Asset Service Providers	
76 x 76 y	Virtual Asset Service Providers Other (specify)	N/A

78 a 79				
79	If Y indicate who provides the approval	Both		
	Does the Entity have specific procedures for			
-	onboarding entities that handle client money such as	No		
	lawyers, accountants, consultants, real estate agents?			
80	Does the Entity perform an additional control or	Yes		
	quality review on clients subject to EDD?			
81	Confirm that all responses provided in the above	Yes		
	Section are representative of all the LE's branches			
81 a	If N, clarify which questions the difference/s			
	relate to and the branch/es that this applies to	H		
		N/A		
82	If appropriate, provide any additional			
	information/context to the answers in this section.			
		NONE		
8 MONT	TORING & REPORTING			
83	Does the Entity have risk based policies, procedures			
00	and monitoring processes for the identification and	Yes		
	reporting of suspicious activity?			
84	What is the method used by the Entity to monitor			
04		Combination of automated and manual		
0.4 -	transactions for suspicious activities?			
84 a	If manual or combination selected, specify what			
	type of transactions are monitored manually	Transactions which are not extracted by the monitoring system but considered as susupicious by our		
		employee are monitored manually.		
84 b	If automated or combination selected, are internal	Vendor-sourced tools		
	system or vendor-sourced tools used?			
84 b1	If 'Vendor-sourced tool' or 'Both' selected,			
	what is the name of the vendor/tool?			
		Bank Business Factory Co.,Ltd. /bank savior		
84 Ь2	When was the tool last updated?	< 1 year		
84 b3	When was the automated Transaction	/1		
	Monitoring application last calibrated?	< 1 year		
85	Does the Entity have regulatory requirements to	v		
25.5	report suspicious transactions?	Yes		
85 a	If Y, does the Entity have policies, procedures and			
	processes to comply with suspicious transaction	Yes		
	reporting requirements?			
86	Does the Entity have policies, procedures and			
	processes to review and escalate matters arising from	Ven		
	the monitoring of customer transactions and activity?	165		
87	Does the Entity have a data quality management			
	programme to ensure that complete data for all	Yes		
	transactions are subject to monitoring?			
88	Does the Entity have processes in place to respond to			
	Request For Information (RFIs) from other entities in	Yes		
	a timely manner?			
89	Does the Entity have processes in place to send			
	Requests for Information (RFIs) to their customers in	Yes		
	a timely manner?	×		
90	Confirm that all responses provided in the above	V		
	Section are representative of all the LE's branches	Yes		
90 a	If N, clarify which questions the difference/s			
	relate to and the branch/es that this applies to			
	, sides to and the ordinary of that this applied to	N/A		
91	If appropriate, provide any additional			
91	If appropriate, provide any additional information/context to the answers in this section.			
91	If appropriate, provide any additional information/context to the answers in this section,	NONE		
91		NONE		
91		NONE		
	information/context to the answers in this section,	NONE		
9. PAYM	information/context to the answers in this section, MENT TRANSPARENCY			
	information/context to the answers in this section,	NONE 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 6	Local Regulations	Yes
93 b1	If Y, specify the regulation	
		In the second se
		As locally applicable
93 c	If N, explain	
	ii ii, anpiani	
94	Does the Entity have controls to support the inclusion	
	of required and accurate originator information in	Yes
	cross border payment messages?	
95	Does the Entity have controls to support the inclusion	
	of required beneficiary information cross-border	Yes
95 a	lf Y, does the Entity have procedures to include	
30 2	beneficiary address including country in cross	Yes
	border payments?	165
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	
		N/A
97	If appropriate provide and district	
31	If appropriate, provide any additional	
	information/context to the answers in this section.	NONE
		NONE
10. SANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
50	management regarding compliance with sanctions law	
	applicable to the Entity, including with respect to its	L.
	business conducted with, or through accounts held at	Yes
	foreign financial institutions?	
00		
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	Yes
	causing the other entity to violate sanctions	Tes
	prohibitions applicable to the other entity (including prohibitions within the other entity's local	
	prohibitions within the other entity's local	
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	Yes
	and/or masking, of sanctions relevant information in	
	cross border transactions?	1
101	Dogo the Estitutes its suctions in 1.1.	
101	Does the Entity screen its customers, including	
	beneficial ownership information collected by the	Yes
	Entity, during onboarding and regularly thereafter against Sanctions Lists?	
102	What is the method used by the Entity for sanctions	
	screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual'	
102 a1	Are internal system of vendor-sourced tools	Both
102 a1a	If a 'vendor-sourced tool' or 'both'	
-	selected, what is the name of the	NET DATA Comme/De la Alan
	vendor/tool?	NTT DATA Corp./Doubt Alert
		SWIFT/TTS
100 -		
102 a2	When did you last test the effectiveness (of	
	finding true matches) and completeness (lack	< 1 year
	of missing data) of the matching configuration	
103	of the automated tool? (If 'Other' please	
100	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location information, contained in cross border transactions	Yes
	against Sanctions Lists?	
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its	
	sanctions screening processes	
106 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
100 '	Sanctions List (UN)	See 15. 50.555
106 Ь	United States Department of the Treasury's	Used for screening customers and beneficial owners and for filtering transactional data
106 -	Office of Foreign Assets Control (OFAC)	g sections and sections of the former and to intering dansactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d		
106 e	European Union Consolidated List (EU) Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data
	Salai (apcony)	
		Unique bad-guy list including a list of Anti-social forces

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.	SHIP MY RE & SHIP MY S
100	branches, subsidiaries, or representative offices	
	located in countries/regions against which UN, OFAC,	
	located in countries/ regions against which on, or AC,	No
	OFSI, EU or G7 member countries have enacted	
	comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above	
109	Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s	
109 a	relate to and the branch/es that this applies to	
	relate to and the branch/es that this applies to.	N/A
		177
110	15	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	NONE
		NONE
Let TOAR	IING & EDUCATION	
111111111111111111111111111111111111111		
111	Does the Entity provide mandatory training, which	
111 a	Identification and reporting of transactions to	Yes
	government authorities	
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations	Yes
	relevant for the types of products and services	
111 c	Internal policies for controlling money laundering,	Yes
	terrorist financing and sanctions violations	100
111 d	New issues that occur in the market, e.g.	Yes
-	significant regulatory actions or new regulations	165
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities	
112 0	have been outsourced	Not Applicable
110.5		Not Applicable
112 f		
113	Does the Entity provide AML, CTF & Sanctions	
	training that is targeted to specific roles,	Yes
	responsibilities and high risk products, services and	166
	activities?	
114	Does the Entity provide customised training for AML,	
114		Yes
777	CTF and Sanctions staff?	Annually
114 a	If Y, how frequently is training delivered?	
115	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	relate to and the branchives that this applies to.	N/A
116	If appropriate, provide any additional	
	information/context to the answers in this section.	
		NONE
12 QUALI	TY ASSURANCE / COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime	Yes
	(separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	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.	
		N/A
120	If appropriate, provide any additional	
	information/context to the answers in this section.	
		NUNE
13. AUDIT	CHARLES WERE BUILDING TO SHEET WATER	
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an	
	internal audit function, a testing function or other	Yes
	independent third party, or both, that assesses FCC	
	AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF,	
	ABC, Fraud and Sanctions programme by the	
122 a	Internal Audit Department	Component based reviews
122 b	External Third Party	Not Applicable
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	Governance	Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k 123 l	Training & Education Other (specify)	Yes
	odici (apecity)	
		N/A
124	Are adverse findings from internal & external audit	
147	tracked to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above	Yes
125 a	section are representative of all the LE's branches	1
120 8	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	relate to and the branchives that this applies to	N/A
		(TANCO
100	Is an experience and the same of	
126	If appropriate, provide any additional information/context to the answers in this section.	
	information/ context to trie answers in this section.	NONE
) 10116
Targette San		
14. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for	
	preventing & detecting fraud?	Yes
	The state of the s	

129	Does the Entity have real time monitoring to detect	No
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	NONE

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
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)

The Bank of Nagoya,Ltd. 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 this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

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

I, Akihide Ando (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 Institution.

I, Katsuaki Kondo (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

 _ (Signature & Date)	α .	andoh.	2025.01.17
 (Signature & Date)	K,	Kondo	2025. 6/1/

Additional writing to CBDDQ (follows)

Decralation

The Bank of Nagoya Ltd. ("Bank") certifies that the Bank appropriately implements Confirmation at the time of transaction and AML/CFT covering its customer on its own responsibility complying with applicable laws.

The Bank understands that correspondent bank appropriately implements Confirmation at the time of transaction and AML/CFT covering its customer on its own responsibility complying with applicable laws.