



Financial Institution Name:

Banque et Caisse d'Epargne de l'Etat, Luxembourg

Location (Country):

Luxembourg

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Banque et Caisse d'Epargne de l'Etat, Luxembourg
2	Append a list of branches which are covered by this questionnaire	The full network of branches throughout the Grand-Duchy of Luxembourg (no branch abroad)
3	Full Legal (Registered) Address	1 Place de Metz, L-2954, Luxembourg
4	Full Primary Business Address (if different from above)	idem
5	Date of Entity incorporation/ establishment	Foundation date: 21 February 1856 - Incorporation date: 22 June 1989
6	Please select type of ownership and append a chart of ownership if available	
6a	Publicly Traded (25% of shares publicly traded)	No
6a1	If Yes, please indicate the exchange traded on and ticker symbol	
6b	Member Owned/ Mutual	No
6c	Government or State Owned by 25% or more	Yes
6d	Privately Owned	No
6d1	If Yes, 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	None
8	Does the Entity, or any of its branches, operate under an offshore banking license (OBL)?	No

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8a	If Yes, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Commission de Surveillance du Secteur Financier (CSSF)
10	Provide Legal Entity Identifier (LEI) if available	R7CQUF1DQM73HUTV1078
11	Provide the full legal name of ultimate parent (if different from the Entity completing the DDQ)	N/A
12	Jurisdiction of licensing authority and regulator of ultimate parent	Luxembourg
13	Select the business areas applicable to the Entity:	
13a	Retail Banking	Yes
13b	Private Banking / Wealth Management	Yes
13c	Commercial Banking	Yes
13d	Transactional Banking	Yes
13e	Investment Banking	Yes
13f	Financial Markets Trading	Yes
13g	Securities Services/ Custody	Yes
13h	Broker/Dealer	No
13i	Multilateral Development Bank	No
13j	Other	N/A
14	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided) ?	No
14a	If Yes, provide details of the country and %	
15	Select the closest value:	
15a	Number of employees	1001-5000
15b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	

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16b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>2. PRODUCTS &amp; SERVICES</b>		
17	Does the Entity offer the following products and services:	
17a	Correspondent Banking	Yes
17a1	If Yes:	
17a2	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
17a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
17a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	Yes
17a9	Does the Entity allow downstream relationships with MSBs/MVTS?	Yes
17a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs/MVTS?	Yes
17b	Private Banking (domestic & international)	Yes
17c	Trade Finance	No
17d	Payable Through Accounts	No
17e	Stored Value Instruments	Yes
17f	Cross Border Bulk Cash Delivery	No
17g	Domestic Bulk Cash Delivery	Yes
17h	International Cash Letter	No
17i	Remote Deposit Capture	No
17j	Virtual /Digital Currencies	No
17k	Low Price Securities	Yes
17l	Hold Mail	Yes
17m	Cross Border Remittances	Yes
17n	Service to walk-in customers (non-account holders)	No
17o	Sponsoring Private ATMs	No
17p	Other high risk products and services identified by the Entity	N/A
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes

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18a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19a	Appointed Officer with sufficient experience/expertise	Yes
19b	Cash Reporting	Yes
19c	CDD	Yes
19d	EDD	Yes
19e	Beneficial Ownership	Yes
19f	Independent Testing	Yes
19g	Periodic Review	Yes
19h	Policies and Procedures	Yes
19i	Risk Assessment	Yes
19j	Sanctions	Yes
19k	PEP Screening	Yes
19l	Adverse Information Screening	Yes
19m	Suspicious Activity Reporting	Yes
19n	Training and Education	Yes
19o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	10-50
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Yes
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23a	If Yes, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24b	If appropriate, provide any additional information/context to the answers in this section.	N/A

4. ANTI-BRIBERY & CORRUPTION		
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	
29a	Joint ventures	No
29b	Third parties acting on behalf of the Entity	No
30	Does the Entity have a global ABC policy that:	
30a	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
30b	Includes enhanced requirements regarding interaction with public officials?	Yes
30c	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
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33a	If Yes, select the frequency	12 months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35a	Potential liability created by intermediaries and other third-party providers as appropriate	No
35b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training to:	
37a	Board and Senior Committee Management	Yes
37b	1st Line of Defence	Yes
37c	2nd Line of Defence	Yes
37d	3rd Line of Defence	Yes

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37e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37f	Non-employed workers as appropriate (contractors/consultants)	No
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>5. POLICIES &amp; PROCEDURES</b>		
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40a	Money laundering	Yes
40b	Terrorist financing	Yes
40c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42a	US Standards	Yes
42a1	If Yes, does the Entity retain a record of the results?	Not Applicable
42b	EU Standards	Yes
42b1	If Yes, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43d	Prohibit accounts/relationships with shell banks	Yes
43e	Prohibit dealing with another Entity that provides services to shell banks	Yes
43f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43g	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
43h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
43i	Define escalation processes for financial crime risk issues	Yes
43j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes

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43l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have record retention procedures that comply with applicable laws?	Yes
45a	If Yes, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46b	If appropriate, provide any additional information/context to the answers in this section.	Regarding 42a: BCEE whose seat is located only in Luxembourg, is not subject to US legislation. However BCEE uses at its own discretion guidelines provided by US institutions in that matter.
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47a	Client	Yes
47b	Product	Yes
47c	Channel	Yes
47d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48a	Transaction Monitoring	Yes
48b	Customer Due Diligence	Yes
48c	PEP Identification	Yes
48d	Transaction Screening	Yes
48e	Name Screening against Adverse Media & Negative News	Yes
48f	Training and Education	Yes
48g	Governance	Yes
48h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49a	If No, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's SANCTIONS EWRA cover the inherent risk components detailed below:	
50a	Client	Yes
50b	Product	Yes
50c	Channel	Yes
50d	Geography	Yes

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51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51a	Customer Due Diligence	Yes
51b	Transaction Screening	Yes
51c	Name Screening	Yes
51d	List Management	Yes
51e	Training and Education	Yes
51f	Governance	Yes
51g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52a	If No, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTION RISK ASSESSMENT are representative of all the LE's branches	Yes
53a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>7. KYC, CDD and EDD</b>		
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed? e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56a	Ownership structure	Yes
56b	Customer identification	Yes
56c	Expected activity	Yes
56d	Nature of business/employment	Yes
56e	Product usage	Yes
56f	Purpose and nature of relationship	Yes
56g	Source of funds	Yes
56h	Source of wealth	Yes
57	Are each of the following identified:	
57a	Ultimate beneficial ownership	Yes
57a1	Are ultimate beneficial owners verified?	Yes
57b	Authorised signatories (where applicable)	Yes



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57c	Key controllers	Yes
57d	Other relevant parties	N/A
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	15%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	If Yes, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60a	Product usage	Yes
60b	Geography	Yes
60c	Business Type/Industry	Yes
60d	Legal Entity type	Yes
60e	Adverse Information	Yes
60f	Other (specify)	N/A
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Yes, is this at:	
62a	Onboarding	Yes
62b	KYC renewal	Yes
62c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media/negative news?	
63a	Automated	No
63b	Manual	Yes
63c	Combination of Automated and Manual	No
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Yes, is this at:	
65a	Onboarding	Yes
65b	KYC renewal	Yes
65c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66a	Automated	No
66b	Manual	No
66c	Combination of Automated and Manual	Yes

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67	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
68	Does the Entity have a process to review and update customer information based on:	
68a	KYC renewal	Yes
68b	Trigger Event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
70a	Non-account customers	Prohibited
70b	Offshore customers	EDD & Restricted on a risk based approach
70c	Shell banks	Prohibited
70d	MVTS/ MSB customers	EDD & Restricted on a risk based approach
70e	PEPs	EDD on a risk based approach
70f	PEP Related	EDD on a risk based approach
70g	PEP Close Associate	EDD on a risk based approach
70h	Correspondent Banks	EDD on a risk based approach
70h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70i	Arms, defense, military	EDD & Restricted on a risk based approach
70j	Atomic power	EDD & Restricted on a risk based approach
70k	Extractive industries	None of the above
70l	Precious metals and stones	EDD on a risk based approach
70m	Unregulated charities	EDD on a risk based approach
70n	Regulated charities	None of the above
70o	Red light business / Adult entertainment	EDD on a risk based approach
70p	Non-Government Organisations	None of the above
70q	Virtual currencies	EDD & Restricted on a risk based approach
70r	Marijuana	Prohibited
70s	Embassies/Consulates	None of the above
70t	Gambling	EDD & Restricted on a risk based approach
70u	Payment Service Provider	EDD & Restricted on a risk based approach
70v	Other (specify)	Religious organisations, refugees

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71	If restricted, please provide details of the restriction	70b: valid commercial reason required (tax planning is not accepted.); 70d, i, q, u: licence granted by the appropriate regulator required; 70j: atomic power entities active in countries subject to sanctions related to atomic industry prohibited; 70t: internet gambling prohibited.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
73b	If appropriate, provide any additional information/context to the answers in this section.	None of those customers are core customer targets of BCEE.
<b>8. MONITORING &amp; REPORTING</b>		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75a	Automated	Yes
75b	Manual	No
75c	Combination of Automated and Manual	No
76	If manual or combination selected, specify what type of transactions are monitored manually	N/A
77	Does the Entity have regulatory requirements to report currency transactions?	Yes
77a	If Yes, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
79b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>9. PAYMENT TRANSPARENCY</b>		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81a	FATF Recommendation 16	Yes
81b	Local Regulations	Yes
81b1	Specify the regulation	EU Regulation 2015/847

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81c	If No, explain	
82	Does the Entity have processes in place to respond to Request for Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
85b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>10. SANCTIONS</b>		
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
87	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
88	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
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
90	What is the method used by the Entity?	
90a	Manual	No
90b	Automated	No
90c	Combination of Automated and Manual	Yes
91	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
92	What is the method used by the Entity?	
92a	Manual	No
92b	Automated	Yes
92c	Combination of Automated and Manual	No
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data

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93b	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
93c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for filtering transactional data (MT fields)
93d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93e	Lists maintained by other G7 member countries	Used for filtering transactional data (MT fields)
93f	Other (specify)	Luxembourg FIU List
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Within 3 days to 5 days
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:	
95a	Customer Data	Within 2 to 3 business days maximum
95b	Transactions	Within 2 to 3 business days maximum
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
97b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>11. TRAINING &amp; EDUCATION</b>		
98	Does the Entity provide mandatory training, which includes:	
98a	Identification and reporting of transactions to government authorities	Yes
98b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98e	Conduct and Culture	Yes
99	Is the above mandatory training provided to:	
99a	Board and Senior Committee Management	Yes
99b	1st Line of Defence	Yes
99c	2nd Line of Defence	Yes
99d	3rd Line of Defence	Yes

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99e	3rd parties to which specific FCC activities have been outsourced	Yes
99f	Non-employed workers (contractors/consultants)	No
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
102b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>12. QUALITY ASSURANCE/COMPLIANCE TESTING</b>		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE/COMPLIANCE TESTING are representative of all the LE's branches	Yes
105a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
105b	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>13. AUDIT</b>		
106	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 and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107a	Internal Audit Department	Yearly
107b	External Third Party	Yearly
108	Does the internal audit function or other independent third party cover the following areas:	
108a	AML, CTF & Sanctions policy and procedures	Yes
108b	KYC / CDD / EDD and underlying methodologies	Yes
108c	Transaction Monitoring	Yes
108d	Transaction Screening including for sanctions	Yes
108e	Name Screening & List Management	Yes
108f	Training & Education	Yes
108g	Technology	Yes

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108h	Governance	Yes
108i	Reporting/Metrics & Management Information	Yes
108j	Suspicious Activity Filing	Yes
108k	Enterprise Wide Risk Assessment	Yes
108l	Other (specify)	N/A
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
110a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to	
110b	If appropriate, provide any additional information/context to the answers in this section.	N/A

## Declaration Statement

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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)

Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name) 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.

Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name) 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 on an annual basis.

Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name) commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (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 Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name)

I, \_\_\_\_\_ (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 Banque et Caisse d'Epargne de l'Etat, Luxembourg (Bank name)

\_\_\_\_\_ (Signature & Date (DD/MM/YYYY))

\_\_\_\_\_ (Signature & Date (DD/MM/YYYY))