## the Wolfsberg Group

Financial Institution Name: Location (Country) :

Banco Latinoamericano de Comercio Exterior, S.A. (BLADEX)

Panama

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.

Full Legal Name	Tull Legal Rame   Sanco Lalinoamericano de Comercio Exterior, S.A.	Commence of State of Entity incorporation with a large of the exchange traded   Public of th	No#	Question	Answer
Full Legal (Registered) Address  Tower V. Business Park, La Rotonda Avenue, Cosla del Este Urbanization, 5th Floor, Panama City, Panama  Full Pernary Business Address (if different from above)  N/A  Full Pernary Business Address (if different from above)  N/A  Date of Entity incorporation/establishment  Full Pernary Business Address (if different from above)  N/A  Select type of ownership and append an ownership chan it available  By Publich' Tracked (25% of shares publich' tracked)  If ', indicate the exchange tracked on and dider symbol  Whys: BLX  By Member Owned-Mutual  N/SE: BLX  By Privately Owned  Privated Ownership of the shareholders or ullimate beneficial corners with a holding of 10% or more N/A  Colleger Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under an Odfeterer Byrithip, or any of 8th branches, perate under a	Evil Legal Name  Banco Latinosmericano de Comercio Exterior, S.A.  Appendia Star of foreign branches which are covered by Rep. Offices. Argentiles, Brazil, Colombia and México Agency, New York, USA.  Full Legal (Registered) Address  Tower V, Business Park, La Rotonda Avenue, Costa del Este Urbanization, 5th Floor. Penama City, Panama  Full Primary Business Address (if different from above)  NA  Set of Entity incorporation/estable/menet  19-Jan-78  March Primary Business Address (if different from above)  NA  Set of Entity incorporation/estable/menet  19-Jan-78  Set of Entity incorporation/estable/menet  19-Jan-78  Set of Entity incorporation/estable/menet  19-Jan-78  NYSE: BLX  Set of Entity incorporation/estable/menet  NYSE: BLX  Set of Entity incorporation/estable/menet  NYSE: BLX  Set of Entity Common Set of	Full Legal Name  Sanco Latinoamericano de Comercio Exterior, S.A.  Appard a list of fossign branches which are covered by Nes questionnaire  Full Legal (Registered) Address  Full Legal (Registered) Address  Full Legal (Registered) Address  Tower V, Business Park, La Rotonda Avenue, Costa del Este Urbanization, Sin Floor. Panama City, Panama  Full Primary Business Address (if different from above)  NA  See Carriery Indiana (25% of diverse publishy rational)  See Carriery Indiana (25% of diverse publishy rational)  Full Primary Business Address (if different from above)  NA  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  See Carriery Indiana (25% of diverse publishy rational)  NYSE: BLX  N			Allawei
Banco Latinoamericano de Comercio Exterior, S.A.  Append a list of foreign branches which are covered by this questionnaire  Post Legal (Registered) Address  Ful Legal (Registered) Address  Ful Legal (Registered) Address  Tower V, Business Park, La Rotonda Avenue, Costa del Este Urbanization, 5th Floor, Panama City, Panama  Ful Primary Business Address (different from above)  NA  Date of Entity incorporation/establishment  Select type of ownership and append an ownership chart if available  Posticy Tracked (25% of shares publicy tracked)  Yes  Type (Comercial Comercial	Banco Latinoamericano de Comercio Esterior, S.A.  Append a lat of foreign branches which are covered by the questionnaire with the provided of	Banco Latinoamericano de Comercio Exterior. S.A.  Append a list of foreign branches which are covered by his questionnare and principle of the questionnare and principle of the provided of t			
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this questionnaire  Agency: New York, USA  Full Legal (Registered) Address  Tower V, Business Park, La Rotonda Avenue, Costa del Este Urbanization, 5th Floor, Panama City, Panama  Tower V, Business Park, La Rotonda Avenue, Costa del Este Urbanization, 5th Floor, Panama City, Panama  Full Primary Business Address (if different from above)  N/A  Date of Entity incorporation/establishment  19-Jan-78  Select type of ownership and append an ownership chant if available  19-Jan-78  Select type of ownership and append an ownership chant if available  19-Jan-78  Member Chanded (25% of shares publicly traded)  19-Jan-78  Member Chanded (25% of shares publicly traded)  19-Jan-78  NYSE: BLX  NYSE: BLX  Member Chanded (35% of shares publicly traded)  10-Yes  Select type of ownership and append an ownership chant if a contract the exchange traded on and locker  NYSE: BLX  NYSE: BLX  NYSE: BLX  NYSE: BLX  NYSE: BLX  Select type of ownership and append an ownership chant if a contract the exchange traded on and locker  NYSE: BLX  NYSE: BLX  NYSE: BLX  NYSE: BLX  Select type of ownership and append an ownership chant if a contract the	file Questionnaire  file Questionnaire  file Questionnaire  full Equil (Registered) Address  fower V. Bushiess Park, La Rotonda Avenue, Costa del Este Urbanization, Sth Floor, Panama City, Panama  full Primary Bushiess Address (if different from above)  NA  full Primary Bushiess Address (if different from above)  NA  Secret type of ownership and append an ownership chair  if a valiable  Secret type of ownership and append an ownership chair  if a valiable  Secret type of ownership and append an ownership chair  if a valiable  Sea Publicity Trade (19% of shares publicly trades)  Yes  all Primary Bushiess (19% of shares publicly trades)  NSSE: BLX  NSSE: BLX  Sh. Member Covered Mushies  Government of Static Ownership and dicker symbol  So Government of Static Ownership and dicker symbol  The Provided Equal to disharchorders or ultimate beneficial owners with a holding of 10% or nore  No  10 Secret type or ownership and dicker shares  Onk  Does the Entity, or any of its branches, operate under an Onk  NA  Does the Entity or any of its branches, operate under an No  Other ownership and one of the relevant branchies who hopeads under an OSBL  NA  Does the Bink have a Virtual Bank License or provide services only through ordine channels?  NA  Does the Bink have a Virtual Bank License or provide services only through ordine channels?  NA  Provide Legal Entity Identifier (LE) if a valiable  Ru C. 1050-2-21666 D.V. 40  Ultimate parvnt  NA	Rep. Offices. Angentins, Brazil, Colombia and México Agency: New York, USA  Ful Legal (Registered) Address  Tower V, Business Purk, La Rotonda Avenue, Costa del Este Urbanization, 5th Floor. Panama City, Panama  Ful Primary Business Address (if different from above)  Date of Entity incorporation/establishment  Sale Selectype of ownership and append an ownership chan if available  B. A. Publich, Tradeg (25%) of shares publich traded  B. B. Herniber Ownership and append an ownership chan if available  B. B. Member Ownershibatial  B. Member Ownershibatial  B. Does the Entity or any of its branches, operate under an office of the Entity's total shares composed of bearer shares  Does the Entity, or any of its branches, operate under an Offices on Branches (BIL)?  B. Does the Entity, or any of its branches, operate under an Offices on Branches (BIL)?  B. Does the Entity or any of its branches, operate under an Offices on Branches (BIL)?  B. Does the Entity or any of its branches, operate under an Offices on Branches (BIL)?  B. Does the Branches of the relevant branches which operate under an Office.  B. Does the Branches of the relevant branches which operate under an Office.  B. Does the Branches of the relevant branches which operate under an Office.  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant branches which operate under an Office.  NA  B. Does the Branches of the relevant bra			Banco Latinoamericano de Comercio Exterior, S.A.
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R.U.C. 1050-2-21666 D.V. 40  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent	R.U.C. 1050-2-21666 D.V. 40  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	R.U.C. 1050-2-21666 D.V. 40  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	11	Provide Legal Entity Identifier (LEI) if available	
Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  13 Jurisdiction of licensing authority and regulator of ultimate parent	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	• •	Trovide Legal Entity Identifier (LEI) II available	
Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  13 Jurisdiction of licensing authority and regulator of ultimate parent	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A			R I I C 1050-2-21666 D V 40
different from the Entity completing the DDQ)  N/A  13  Jurisdiction of licensing authority and regulator of ultimate parent	different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A			11.0.0. 1030 £ £1000 D.V. 40
different from the Entity completing the DDQ)  N/A  13  Jurisdiction of licensing authority and regulator of ultimate parent	different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A			
different from the Entity completing the DDQ)  N/A  13  Jurisdiction of licensing authority and regulator of ultimate parent	different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	different from the Entity completing the DDQ)  N/A  Jurisdiction of licensing authority and regulator of ultimate parent  N/A	12	Provide the full legal name of the ultimate parent (if	
N/A  Jurisdiction of licensing authority and regulator of ultimate parent	Jurisdiction of licensing authority and regulator of ultimate parent  N/A  N/A	Jurisdiction of licensing authority and regulator of ultimate parent  N/A  N/A	14		
Jurisdiction of licensing authority and regulator of ultimate parent	Jurisdiction of licensing authority and regulator of ultimate parent  N/A	Jurisdiction of licensing authority and regulator of ultimate parent  N/A		unierent nom the Entity completing the DDQ)	N/A
ultimate parent	ultimate parent N/A	ultimate parent N/A			
ultimate parent	ultimate parent N/A	ultimate parent N/A			
ultimate parent	ultimate parent N/A	ultimate parent N/A	13	Jurisdiction of licensing authority and regulator of	
N/A	N/A	N/A		, ,	
I IIV/A				admitted parent	N/A
	14 Select the business areas applicable to the Entity	14 Select the business areas applicable to the Entity			
	14 Select the business areas applicable to the Entity	14 Select the business areas applicable to the Entity			
14 Select the business areas applicable to the Entity			14	Select the business areas applicable to the Entity	
				The second of the second of the second	

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14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No No
14 j	Wealth Management	No
14 k	Other (please explain)	Bladex offers traditional trade finance products, including loans, letters of credits, issuance of guarantees, etc.
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)	Yes
15 a	If Y, provide the top five countries where the non- resident customers are located.	Mexico, Colombia, Brazil, Guatemala and Peru.
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
2 DPODII	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	103
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No
19 a1h3	PSPs	No

19 a1i	Does the Entity have processes and procedures	
		Yes
	MSBs /MVTSs/PSPs?	103
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
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	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	N-
	oner time party payment services to their customers:	NO 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	
	·	
		N/A
10 i	Private Banking	No
19 j		
19 k	Remote Deposit Capture (RDC)	No .
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
		110
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:	
19 p1		No
19 p1a	If yes, state the applicable level of due diligence	
19 p2		No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4		No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including	
	describing the level of due diligence.	N/A
	y y	
19 a	Other high-risk products and services identified by the	
19 q	Other high-risk products and services identified by the	
19 q	Entity (please specify)	N/A
19 q	Entity (please specify)	N/A
19 q	Entity (please specify)	N/A
	Entity (please specify)	
19 q	Entity (please specify)  Confirm that all responses provided in the above Section	N/A Yes
20	Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.	
	Entity (please specify)  Confirm that all responses provided in the above Section	
20	Entity (please specify)  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	
20	Entity (please specify)  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.	
20	Entity (please specify)  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.	Yes
20	Entity (please specify)  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.	Yes
20 20 a	Entity (please specify)  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.	Yes
20	Entity (please specify)  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.	Yes
20 20 a	Entity (please specify)  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.	Yes N/A
20 20 a	Entity (please specify)  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.	Yes
20 20 a	Entity (please specify)  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.	Yes N/A
20 20 a	Entity (please specify)  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.	Yes N/A
20 20 a	Entity (please specify)  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.	Yes N/A
20 20 a	Entity (please specify)  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.	Yes N/A
20 20 a 21 3. AML, CT	Entity (please specify)  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.	Yes N/A
20 20 a 21 3. AML, CT	Entity (please specify)  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.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Yes N/A
20 20 a 21 3. AML, CT 22	Entity (please specify)  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 & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes N/A N/A
20 20 a 21 3. AML, CT 22 22 a	Entity (please specify)  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.	Yes N/A N/A Yes
20 20 a 21 3. AML, CT 22	Entity (please specify)  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.  If & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes N/A N/A
20 20 a 21 3. AML, CT 22 22 a	Entity (please specify)  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.	Yes N/A N/A Yes
20 20 a  21  3. AML, CT 22  22 a 22 b 22 c	Entity (please specify)  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.  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.  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.	Yes N/A N/A Yes Yes Yes Yes
20 20 a  21  3. AML, CT 22  22 a 22 b 22 c 22 d	Entity (please specify)  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 & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting	Yes N/A N/A Yes Yes Yes Yes Yes Yes
20 20 a  21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	Entity (please specify)  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 & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f	Entity (please specify)  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.  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.	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 3. AML, CT 22 2 a 22 b 22 c 22 d 22 e	Entity (please specify)  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 & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 f	Entity (please specify)  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.  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.	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Entity (please specify)  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.  FF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a  21 21 22 a  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i	Entity (please specify)  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.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Entity (please specify)  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.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j 22 k	Entity (please specify)  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.  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.  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.  If appropriate, provide any additional information/context to the answers in this section.	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Entity (please specify)  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.  IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	Yes  N/A  N/A  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye

00	Commissions Ashirity Demanting	V
22 m	Suspicious Activity Reporting Training and Education	Yes Yes
22 n 22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
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	Yes
25	Question 29.  Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions	Yes
26	Does the Entity use third parties to carry out any	Yes
26 a	components of its AML, CTF & Sanctions programme?  If Y, provide further details	
		The Bank may use reputable auditors to assess the adequacy and effectiveness of AML controls.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
29	If appropriate, provide any additional information/context to the answers in this section.	The status of the AML, CTF and Sanctions Program is reported every two months to the Compliance and Prevention Committee, which in turn reports to the board of directors.
4. ANTI BI	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	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 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	N/A
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:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes

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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	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
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.	N/A
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
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 procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	Not Applicable
49 49 a	Does the Entity have policies and procedures that:  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
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	Yes
49 f	services to shell banks  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

	wollsberg Group Co	orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 I	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 relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
53	If appropriate, provide any additional information/context to the answers in this section.	N/A
6. AML, CT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d 55	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d 55 e	Transaction Screening  Name Screening against Adverse Media/Negative News	Yes Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
		N/A
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	risk components detailed below: Client	Yes
57 a 57 b	risk components detailed below:  Client  Product	Yes Yes
57 a 57 b 57 c	risk components detailed below:  Client  Product  Channel	Yes Yes Yes
57 a 57 b 57 c 57 d	risk components detailed below: Client Product Channel Geography	Yes Yes
57 a 57 b 57 c	risk components detailed below:  Client  Product  Channel	Yes Yes Yes
57 a 57 b 57 c 57 d 58	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 Yes Yes Yes Yes Yes
57 a 57 b 57 c 57 d 58 58 a 58 b	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 Yes Yes Yes Yes Yes Yes Yes
57 a 57 b 57 c 57 d 58	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 Yes Yes Yes Yes Yes

	Name Careening	V <sub>2</sub>
58 e	Name Screening	Yes
58 f	Transaction Screening Training and Education	Yes Yes
58 g 59	Has the Entity's Sanctions EWRA been completed in the	
39	last 12 months?	Yes
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 Section	
00	are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		N/A
61	If appropriate, provide any additional information/context	
01	to the answers in this section.	<u> </u>
	to the answere in this section.	An independent Sanctions Control Risk Assessment was conducted through the Bank's New York Agency within the last 12 months.
		within the last 12 months.
- 10/0 0		
	Do and EDD	lyan
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	100
64	Which of the following does the Entity gather and retain	
-	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h 65	Source of wealth  Are each of the following identified:	Yes
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
66	What is the Entity's minimum (lowest) threshold applied	10%
	to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
67 a	receiving a risk classification?  If Y, what factors/criteria are used to determine the	
67 a	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	Adverse Information	Yes
67 a6	Other (specify)	
		PEP, Shareholder Structure
		,
68	For high risk non-individual customers, is a site visit a	Yes
	part of your KYC process?	•
68 a	If Y, is this at:	No
68 a1 68 a2	Onboarding  KYC renewal	No No
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	
	, , p	Visits are carried out by Business Executives as may be deemed necessary. Call reports are created for all
		visits and records are kept for proper control and monitoring.
		visits and records are kept for proper control and monitoring.
69	Does the Entity have a risk based approach to screening	
U3	customers for Adverse Media/Negative News?	Yes
	Substitution of Autoriae Wiedlan regative News:	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Automated
	Adverse Media/Negative News?	Automateu
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether	L.
	they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Von
		Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
		Automateu
73	Does the Entity have policies, procedures and processes	
. •	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	1.00
	they are relia, or controlled by relia:	
	In ICCC remarked at defined from consider beared on right	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
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	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	, , , , , , , , , , , , , , , , , , , ,	
		N/A
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	
70	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
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	Yes
	Correspondent Banking Principles 2022?	1.00
76 c	Embassies/Consulates	Prohibited
76 d	Extractive industries	Restricted
76 e	Gambling customers	Prohibited
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	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	Prohibited
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Prohibited
		EDD on risk-based approach
76 s	Regulated charities	
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Prohibited
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	Prohibited
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
		N/A
77	If restricted, provide details of the restriction	
		lm
		Illegal mining is a prohibited activity.
	Dave EDD was deep assistants.	
78	Does EDD require senior business management and/or	Yes
	compliance approval?	l <sup></sup>

		rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
82	If appropriate, provide any additional information/context to the answers in this section.	N/A
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	N/A
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	N/A
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
91	If appropriate, provide any additional information/context to the answers in this section.	N/A
9. PAYME	ENT TRANSPARENCY	

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193   Docs the Cettly Insert controls to appear the inclusion of required and accordance of required accordance accor		1 1 7	
Section   Content   Cont			
Law 20 of 2015, Rule 10-2015 and its modifications   Package			Yes
93 c If N, explain  94	93 b1	If Y, specify the regulation	
93 c If N, explain  94			Law 23 of 2015, Rule 10-2015 and its modifications
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			rosca for screening customers and beneficial owners and for intering (fatisactional data

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

106 b	United States Department of the Treasury's Office of	Lload for corponing auctomore and honoficial owners and for filtering transactional data
	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)	All Lists included in Lexis Nexis with World Compliance Licence
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.	N/A
110	If appropriate, provide any additional information/context to the answers in this section.	N/A
11. TRAINI	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
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 have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section	
113	are representative of all the LE's branches	Yes

		oriespondent banking bue bingence questionnaire (CBDDQ) V1.4
115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		N/A
116	If appropriate, provide any additional information/context	
110	to the answers in this section.	
	to the answers in this section.	N/A
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	L
		N/A
120	If appropriate, provide any additional information/context	
120	to the answers in this section.	
	to and districted in this decident.	N/A
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	Yes
	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 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	Yes
1001	procedures	No.
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 Yes
123 e	Reporting/Metrics & Management Information	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	Training & Education	Yes
123 I	Other (specify)	
		N/A
404	Annual control of the state of	
124	Are adverse findings from internal & external audit	W
	tracked to completion and assessed for adequacy and	Yes
105	completeness?	
125	Confirm that all responses provided in the above section	Yes
125 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	
120 d	and the branch/es that this applies to.	
	and the branchies that this applies to.	N/A
	T C C C C C C C C C C C C C C C C C C C	
126	If appropriate, provide any additional information/context	
126	If appropriate, provide any additional information/context to the answers in this section.	
126		N/A
126		N/A
	to the answers in this section.	N/A
14. FRAU	to the answers in this section.	
	to the answers in this section.  UD  Does the Entity have policies in place addressing fraud	N/A Yes
14. FRAU 127	JD  Does the Entity have policies in place addressing fraud risk?	Yes
14. FRAU	to the answers in this section.  UD  Does the Entity have policies in place addressing fraud	

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

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A

## **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)

Banco Latinoamericano de Comercio Exterior, S.A. (BLADEX) (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

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

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

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in 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, Annette Van Hoorde de Solís (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, Tatiana Calzada Lombana (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.

Tatiana Calzada 08/14/2024

(Signature & Date)

(Signature & Date)

# citrix RightSignature

## SIGNATURE CERTIFICATE



## **REFERENCE NUMBER**

F3AECB09-9A29-42B8-9E1E-862FBB9BC65F

## TRANSACTION DETAILS

**Reference Number** 

F3AECB09-9A29-42B8-9E1E-862FBB9BC65F

**Transaction Type** 

Signature Request

Sent At

08/14/2024 15:56 EDT

**Executed At** 

08/15/2024 11:53 EDT **Identity Method** 

email

**Distribution Method** 

email

Signed Checksum

823412d2dace2be5a3f95ef30788578f5a9bb6a46d08004092be2c85049e8ee9

**E-SIGNATURE** 

Signer Sequencing

Enabled

**Document Passcode** 

Disabled

SIGNER

## **DOCUMENT DETAILS**

**Document Name** 

CBDDQ v1 4 0 VF

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Pages 13 pages

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**Original Checksum** 

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**EVENTS** 

## **SIGNERS**

SIGNLII	E-SIGNATORE	LVLINIS	
<b>Name</b> Annette Van Hoorde	Status signed	Viewed At 08/15/2024 11:52 EDT	
Email	Multi-factor Digital Fingerprint Checksum	Identity Authenticated At	
asolis@bladex.com	0d52c4010b2b401df786ae0f3ed32194d2bfc0734e5c90572f7c137856fb17b5	08/15/2024 11:53 EDT	
Signer Sequence 1 Components 2	IP Address 138.186.89.10 Device	<b>Signed At</b> 08/15/2024 11:53 EDT	
2	Microsoft Edge via iOS		
	Drawn Signature  Thum & Lake		
	Signature Reference ID E9AB7E17		
	Signature Biometric Count 5		
Name	Status	Viewed At	
Tatiana Calzada Lombana	signed	08/14/2024 16:12 EDT	
Email	Multi-factor Digital Fingerprint Checksum	Identity Authenticated At 08/14/2024 16:13 EDT Signed At 08/14/2024 16:13 EDT	
tcalzada@bladex.com	718b91530fdf2c303887ee309645177d79a477679a411eab0d694c861daa115e		
Signer Sequence	IP Address 165.225.222.174		
Components 2	<b>Device</b> Microsoft Edge via Windows		
	Typed Signature		
	Tatiana Calzada		
	Signature Reference ID 31073B63		

## **AUDITS**

TIMESTAMP	AUDIT
08/14/2024 15:56 EDT	Cumplimiento Bladex (gconcumplimientopa@bladex.com) created document 'CBDDQ_v1_4_0_VF.pdf' on Microsoft Edge via Windows from 165.225.222.162.
08/14/2024 15:56 EDT	Tatiana Calzada Lombana (tcalzada@bladex.com) was emailed a link to sign.
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08/14/2024 16:13 EDT	Annette Van Hoorde (asolis@bladex.com) was emailed a link to sign.
08/14/2024 17:44 EDT	Annette Van Hoorde (asolis@bladex.com) was emailed a reminder.
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