the Wolfsberg Group

Financial Institution Name:	BOK International		
Location (Country) :	Abu Dhabi UAE		

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
1. EN	TITY & OWNERSHIP	
1	Full Legal Name	BOK International - Abu Dhabi
2	Append a list of branches which are covered by this questionnaire	BOK International - Abu Dhabi (Branch of Bank of Khartoum)
3	Full Legal (Registered) Address	Al Sahel Tower, Zayed The First Street, Al Khalidiya, Abu Dhabi
4	Full Primary Business Address (if different from above)	same as above
5	Date of Entity incorporation/ establishment	18/05/2017
6	Select type of ownership and append an	
6 a	ownership chart if available Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Khartoum Stock Exchange, KHBA
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Central Bank of the UAE
10	Provide Legal Entity Identifier (LEI) if available	N/A

11	Provide the full legal name of the ultimate parer	Deal alle de la constant de la const
	(if different from the Entity completing the DDQ)	Bank of Khartoum co. Ltd.
12	Jurisdiction of licensing authority and regulator	
	of ultimate parent	UAE
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	No No
13 f	Financial Markets Trading	No No
13 g	Securities Services/ Custody	No No
13 h	Broker/Dealer	No No
13 i	Multilateral Development Bank	
13 j	Other	No
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)?	Yes
14 a	If Y, provide details of the country and %	60% - Onshore 40% - Offshore (Sudan, Bahrain, Singapore)
15	Select the closest value:	
15 a	Number of employees	1-50
15 b	Total Assets	Between \$100 and \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	No No
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	BOK International UAE is a branch of Bank of Khartoum, Sudan
16 b	If appropriate, provide any additional information / context to the answers in this section.	

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	ODUCTS & SERVICES	
17	Does the Entity offer the following products and	
47 -	services:	
17 a	Correspondent Banking	No
	If Y	
17 a2	Does the Entity offer Correspondent Banking	No
17 a3	services to domestic banks? Does the Entity allow domestic bank clients to	
17 43	provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures	
	in place to identify downstream relationships	Yes
	with domestic banks?	
17 a5	Does the Entity offer correspondent banking	N.
	services to Foreign Banks?	No
17 a6	Does the Entity allow downstream relationships	No
	with Foreign Banks?	INO
17 a7	Does the Entity have processes and procedures	
	in place to identify downstream relationships	Yes
	with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking	No .
4= 0	services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships	No
17 -10	with MSBs/MVTS?	
II alu	Does the Entity have processes and procedures	v.
	in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	No
	Trade Finance	Yes
	Payable Through Accounts	No
	Stored Value Instruments	No No
	Cross Border Bulk Cash Delivery	No
	Domestic Bulk Cash Delivery	No
	International Cash Letter	No
	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	No
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account	
	holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified	The entity does not provide any additional high risk products
	by the Entity	The state 4000 het provide any additional high risk products
18	Confirm that all responses provided in the	
		Yes
	representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional	
ALCOHOLD IN	information / context to the answers in this	
	section.	

3 4	ML, CTF & SANCTIONS PROGRAMME	
19	Doca the Estitute	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
19 a	regarding the following components:	
19 a	Appointed Officer with sufficient	Yes
19 b	experience/expertise	
	Cash Reporting	Yes
19 c	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the	165
	Entity's AML, CTF & Sanctions Compliance	Less than 10
	Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	165
22	Does the Board or equivalent Senior	
	Management Committee receive regular	
	reporting on the status of the AML, CTF &	Yes
	Sanctions programme?	
23	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions	No
	programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above	
	Section AML, CTF & SANCTIONS Programme	Yes
	are Representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
4 b	If appropriate, provide any additional	
~	information / context to the answers in this	
	section.	
	OCCUPATION NO.	

4. A	NTI 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:	
29 a	Joint ventures	Yes
29 b	Third parties acting on behalf of the Entity	Yes
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
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
33 a	If Y 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	Doos the Estitute ABC FIMEA	
55	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
	not components detailed below.	
35 a	Potential liability created by intermediaries and	
	other third-party providers as appropriate	Yes
L		10.4 - 3.70
35 b	Corruption risks associated with the countries	Marie and the second se
	and industries in which the Entity does business, directly or through intermediaries	Yes
35 c	Transactions, products or services, including	
	thosethat involve state-owned or state-controlled	Yes
	entities or public officials	
35 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable	Yes
35 e	donations and political contributions Changes in business activities that may	
55 e	materially increase the Entity's corruption risk	Vaa
	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	Yes
	Procedures?	
37	Does the Entity provide mandatory ABC training	
37 a	to: Board and Senior Committee Management	
37 b		Yes
	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities	
	subject to ABC risk have been outsourced	
		Yes
37 f	Non-employed workers as appropriate	
	(contractors/consultants)	Yes
		res
38	Describe Felilian II ABOL III III	
50	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and	
	activities?	Yes
39	Confirm that all responses provided in the above	
	Section Anti Bribery & Corruption are	
	representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information	
	context to the answers in this section.	

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risk boundary around their business? Does the Entity have a record retention procedures that comply with applicable laws? If Y, what is the retention period? Confirm that all responses provided in the above Section POLICIES & PROCEDURES 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		statement or similar document which defines a	Yes
procedures that comply with applicable laws? Yes If Y, what is the retention period? Confirm that all responses provided in the above Section POLICIES & PROCEDURES 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			
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If Y, what is the retention period? 5 Years or more Confirm that all responses provided in the above Section POLICIES & PROCEDURES 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	J	procedures that comply with applicable laws?	Yes
5 Years or more Confirm that all responses provided in the above Section POLICIES & PROCEDURES 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			
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above Section POLICIES & PROCEDURES are representative of all the LE's branches 16 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 16 b If appropriate, provide any additional information / context to the answers in this	C	Confirm that all an	o rodio oi more
representative of all the LE's branches 16 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 16 b If appropriate, provide any additional information / context to the answers in this	o		
representative of all the LE's branches 16 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 16 b If appropriate, provide any additional information / context to the answers in this			Yes
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section.			
		section.	

6. A	ML, CTF & SANCTIONS RISK ASSESSM	ENT
47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
		Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes Yes
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been	Yes
	completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
1 a	Customer Due Diligence	
1 b	Transaction Screening	Yes
1 c	Name Screening	Yes
1 d	List Management	Yes
	- Control of the Cont	Yes
1 e	Training and Education	Yes
1 f	Governance	Yes
1 g	Management Information	Yes
2	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
2 a	If N, provide the date when the last Sanctions EWRA was completed.	Yes
3	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
а	If N, clarify which questions the difference/s	Yes
a	relate to and the branch/es that this applies to.	
b	If appropriate, provide any additional information / context to the answers in this section.	

7. K	YC, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	165
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	Yes, where applicable
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	
		Service and products channels

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	Yes
63 b	Manual	Yes
63 c	Combination of automated and manual	Yes
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 Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	Yes
66 b	Manual	
66 c	Combination of automated and manual	
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:	
68 a	KYC renewal	Yes
68 b	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?	
70 a	Non-account customers	EDD & Restricted on a risk based approach
70 b	Offshore customers	EDD on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD & Restricted on a risk based approach
70 j	Atomic power	Prohibited
70 k	Extractive industries	EDD on a risk based approach
70 I	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	High net worth and cash intensive customers
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
	If appropriate, provide any additional information / context to the answers in this section.	

8. IV	ONITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	Yes
75 b	Manual	163
75 c	Combination of automated and manual	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report currency transactions?	Yes
77 a	If Y, 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
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
). PA	YMENT TRANSPARENCY	
0	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
1	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
1 a	FATF Recommendation 16	Yes
1 b	Local Regulations	Yes
1 b1	Specify the regulation	Central Bank of the UAE Federal Law No. 20 of 2018 on Anti-Money Laundering and Combatting of Financing of Terrorism and Illegal Organizations
1 c	If N, explain	
2	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
3	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes

0.4	[B E		
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 aboveSection PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes	
	less and the second		
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
85 b	If appropriate, provide any additional information / context to the answers in this section.		
10. S	ANCTIONS		
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?		
90 a	Manual	No	
90 b	Automated	Yes	
90 c 91	Combination of Automated and Manual 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	
32	What is the method used by the Entity?		
92 a	Manual	No	
92 b 92 c	Automated Combination Automated and Manual	Yes	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	
3 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	
3 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)	
3 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
3 е	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)	

93 f	Other (specify)	
931	Other (specify)	All lists are covered by World Check
1		
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 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:	
95 a	Customer Data	Same day
95 b	Transactions	Same day
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
11 T	RAINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 с	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 е	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Not Applicable
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	
	aboveSection TRAINING & EDUCATION are	Yes
	representative of all the LE's branches	Tes
102 a		
	relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional	All Compliance staff are CAMOL III
	information / context to the answers in this	All Compliance staff are CAMS holders
	section.	
12. Q	UALITY ASSURANCE /COMPLIANCE TE	STING
103	Are the Entity's KYC processes and documents	o.mc
	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 /	v.
	COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional	
	information / context to the answers in this	
	section.	
13. AL	IDIT	
	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	Yes
	assesses FCC AML, CTF and Sanctions	
	policies and practices on a regular basis?	
107	How often is the Entity audited on its AML, CTF	
	& Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly
		cany

Does the internal audit function or other	
independent third party cover the following areas:	
AML, CTF & Sanctions policy and procedures	Yes
KYC / CDD / EDD and underlying methodologies	Yes
Transaction Monitoring	Yes
Transaction Screening including for sanctions	Yes
Name Screening & List Management	Yes
Training & Education	Yes
Technology	Yes
Governance	Yes
Reporting/Metrics & Management Information	Yes
Suspicious Activity Filing	Yes
Enterprise Wide Risk Assessment	Yes
Other (specify)	
Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
Confirm that all responses provided in the above Section, AUDIT are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
	areas: AML, CTF & Sanctions policy and procedures KYC / CDD / EDD and underlying methodologies Transaction Monitoring Transaction Screening including for sanctions Name Screening & List Management Training & Education Technology Governance Reporting/Metrics & Management Information Suspicious Activity Filing Enterprise Wide Risk Assessment Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above Section, AUDIT 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

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of

Declaration Statement (To be signed by Global Head of Correspondent Banking or

Anti- Money Launder Compliance OR equi		Global Head of Financial Crimes
	ery effort to remain in full compl	mmitted to the fight against financial liance with all applicable financial crime ions in which it does business and holds
		nds the critical importance of having all crime in order to protect its reputation
BOK International regarding parties to t adopting these stand	ransactions in international pay	s the importance of transparency ments and has adopted/is committed to
Finance Principles. T	sberg Correspondent Banking I he information provided in this no less frequently than on an ar (Bank name) comm	rtifies it complies with/is working to Principles and the Wolfsberg Trade Wolfsberg CBDDQ will be kept current nnual basis. its to file accurate supplemental
Wolfsberg CBDDQ a	d and understood this declarat	Correspondent Banking or equivalent), tion, that the answers provided in this honest belief, and that I am authorised
, Benzy George, Deputy MLRC understood this declar complete and correct declaration on behalf 03/07/2019	to my honest belief, and that I of BOK International	alent), certify that I have read and ed in this Wolfsberg CBDDQ are am authorised to execute this (Bank name)