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

the Wolfsberg Group

Financial Institution Name: Location (Country):

Joint Stock Company "StatusBank" Republic of Belarus

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	Joint Stock Company "StatusBank"
2	Append a list of foreign branches which are covered by this questionnaire	The Bank has no branches
3	Full Legal (Registered) Address	Denisovskaya street 8A, 220006, Minsk, Republic of Belarus
4	Full Primary Business Address (if different from above)	Address is the same
5	Date of Entity incorporation/establishment	25 February 2002
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Information is available upon request
7	% of the Entity's total shares composed of bearer shares	No bearer shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	-
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	The National Bank of the Republic of Belarus
11	Provide Legal Entity Identifier (LEI) if available	807000043
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	-

13		
	Jurisdiction of licensing authority and regulator of ultimate parent	Republic of Belarus
1	ulumate parent	
14	Colort the husiness and a selection to the Futite	
14 a	Select the business areas applicable to the Entity Retail Banking	
14 a	Private Banking	Yes
14 C		Yes
14 d	Commercial Banking Transactional Banking	Yes
14 u	Investment Banking	Yes
14 e	Financial Markets Trading	Yes
	Securities Services/Custody	Yes
14 g 14 h	Broker/Dealer	No
14 ii	Multilateral Development Bank	Yes
14 j	Wealth Management	No
14 k	Other (please explain)	Yes
14 K	Otter (please explain)	
	1	
15	Door the Entity have a significant (100/)	
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	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
45 -	I KVid-th-th-th-fi	
15 a	If Y, provide the top five countries where the non- resident customers are located.	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Between \$10 and \$100 million
17	Confirm that all responses provided in the above	No branches
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	-
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
	information/context to the answers in this section.	
	mornation local to the drivers in the section.	
	information to the district in this section.	
2. PRODU		
2. PRODU	CTS & SERVICES Does the Entity offer the following products and	
	CTS & SERVICES	
	CTS & SERVICES Does the Entity offer the following products and	No.
19	CTS & SERVICES Does the Entity offer the following products and services:	No.
19 19 a	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	
19 19 a 19 a1	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	No No
19 19 a 19 a1	ICTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	No No
19 a 19 a 19 a1 19 a1a	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	
19 a 19 a 19 a1 19 a1a	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	No No
19 a 19 a 19 a1 19 a1a 19 a1b	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	No No
19 a 19 a 19 a1 19 a1a 19 a1b	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures	No No
19 a 19 a 19 a1 19 a1a 19 a1b	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	No No
19 a 19 a 1 19 a 1 a 1 a 1 a 1 b 1 a 1 b 1 9 a 1 c	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No No
19 a 19 a 1 19 a 1 a 1 a 1 a 1 b 1 a 1 b 1 9 a 1 c	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to identify downstream relationships with foreign banks?	No No No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No No No No No
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No No No No No No No
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships	No No No No No No No
19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No No No No No No No
19 a 1	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No No No No
19 a 1 9 a 1 1 9 a 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 9 a 1 1 1 1	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity for Correspondent Banking services to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No No No No
19 a 1	CTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No No No No No No No

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	Yes
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?	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	THO .
19 j	Private Banking	Domestic
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
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	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
19 p3		2 HOLD TO CHARLES AND CHARLES AND CO.
	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and verification
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	-
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3 AMI C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	
	EDD	Yes
22 f		Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
		Yes
22	Sanctions	

22 m	Suspicious Activity Reporting	Yes
22 m	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	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 Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
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	No branches
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
29	If appropriate, provide any additional information/context to the answers in this section.	-
4. ANTI	BRIBERY & 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:	Not Applicable
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.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
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 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	165
42 f	subject to ABC risk have been outsourced Non-employed workers as appropriate	No
	(contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
45	If appropriate, provide any additional information/context to the answers in this section.	-
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:	· 医乳腺 交通企业 医二维氏学 医红斑 (1) (1) (1) (1)
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable
48 b	EU Standards	No Applicable
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	Not Applicable
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	
49 d 49 e	Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for	Yes No
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	

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	103
,	terminating existing customer relationships due to	
	financial crime risk	Yes
49 k	Define the process for exiting clients for financial	Para a manager of the control of the
	crime reasons that applies across the entity,	
49	including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for	
	financial crime reasons if they seek to re-establish a	
	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	Tes
	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	No branches
52 a	If N, clarify which questions the difference/s relate to	
32 d	and the branch/es that this applies to.	-
53	If appropriate, provide any additional	48. 49 f - Not applicable for the jurisdiction
	information/context to the answers in this section.	
6. AML, CTI	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML. & CTF EWRA cover the	
34	inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the	
	Icontrols effectiveness components detailed below:	
55 a	controls effectiveness components detailed below:	Vec
55 a 55 b	Transaction Monitoring	Yes Yes
		Yes Yes Yes
55 b 55 c 55 d	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
55 b 55 c	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes
55 b 55 c 55 d 55 e	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes
55 b 55 c 55 d 55 e	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes -
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 c 57 d	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 c 57 d 58	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 c 57 d 58	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes

58 e	Name Screening	l Van
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59 g	Has the Entity's Sanctions EWRA been completed in	Yes
	the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
61	If appropriate, provide any additional information/context to the answers in this section.	-
7. KYC. (CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
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	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c 65 d	Key controllers Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Yes 10%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	For a risk assessment of working with the customers Bank uses a three-vector model of risk: risk by the customer profile, risk by the geographic region, risk by type transaction.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
68 a4 68 a4a	Other If yes, please specify "Other"	No
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
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	
71	Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3 74 a4	3 – 4 years 5 years or more	Yes
74 a4 74 a5	Trigger-based or perpetual monitoring reviews	No Yes
74 a6	Other (Please specify)	high risk - less than one year medium risk - less than two years low risk - less than tree years
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Always subject to EDD
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
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	Always subject to EDD
761	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Restricted
76 o	PEP Close Associates	Restricted
76 p	PEP Related	Restricted
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited Prohibited
76 s	Regulated charities	Always subject to EDD
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Restricted
76 y	Other (specify)	-
77	If restricted, provide details of the restriction	76n-p - Law No.165Z dd 30/06/2014 & Bank policy (All relathionships with PEP or organizations, whose beneficial owners are PEP are possible only upon the written permision of the Head of the Bank or persons authorized by him.); 76x - President Decree No.8 dd 21/12/2017
78	Does EDD require senior business management and/ or compliance approval?	Yes

80	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents? Does the Entity perform an additional control or	Compliance
80	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	lawyers, accountants, consultants, real estate agents?	No
81	Does the Entity perform an additional control or	
81		
	quality review on clients subject to EDD?	Yes
	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	No branches
81 a	If N, clarify which questions the difference/s relate to	-
	and the branch/es that this applies to	
1 . 12		
-		
	If appropriate, provide any additional	-
	information/context to the answers in this section.	
MONITO	PRINC & DEPORTING	
Т	RING & REPORTING	
	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	
	reporting of suspicious activity?	Yes
34	What is the method used by the Entity to monitor	
	transactions for suspicious activities?	Combination of automated and manual
34 a	If manual or combination selected, specify what	Transactions that can't be detected automatically (f.e. transactions related to unusual customer
re d	type of transactions are monitored manually	behavior when concluding a contract or performing a transaction)
	Ar and and and morning mandany	g a nanadanan)
	If automated or combination selected, are internal	
34 b	system or vendor-sourced tools used?	Internal System
414	KD/dd	
34 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	-
	the flame of the veridor/toor?	
1		
	W	
34 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	
	application last calibrated?	< 1 year
	5 4 5 6 4	
	Does the Entity have regulatory requirements to report suspicious transactions?	
	Toport suspicious transactions:	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	
	reporting requirements?	Yes
	D. d. F. dh. b	
	Does the Entity have policies, procedures and processes to review and escalate matters arising from	
	the monitoring of customer transactions and activity?	Yes
	and don't !	(A.D.)
	Does the Entity have a data quality management	
	programme to ensure that complete data for all	
t	transactions are subject to monitoring?	Yes
18	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	
	in a timely manner?	Yes
9 [Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in	
	a timely manner?	Yes
0 (Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	No branches
0 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
	lf appropriate, provide any additional	-
ļi	information/context to the answers in this section.	
. PAYMEN	T TRANSPARENCY	
2 [Does the Entity adhere to the Wolfsberg Group	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law No.165-Z dated June 30,2014 "On prevent measures against money laundering, financing of terrorism and proliferatiob of weapons of mass destruction". Instruction on Bank transfer. Resolution of the Board of the National Bank of the Republic of Belarus No.66 dated March 29,2001
93 с	If N, explain	-
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
97	If appropriate, provide any additional information/context to the answers in this section.	-
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Internal System
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	-
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
100	Does the Entity screen all sanctions relevant data,	
103	including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes

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

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
116	If appropriate, provide any additional information/context to the answers in this section.	-
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
120	If appropriate, provide any additional information/context to the answers in this section.	-
43 AUDIT		
13. AUDIT 121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
122 b 123	External Third Party Does the internal audit function or other independent	Yearly
123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
120 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes Yes
123	Other (specify)	-
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
	tracked to completion and assessed for adequacy	Yes No branches
125	tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above	
125 125 a	tracked to completion and assessed for adequacy and completeness? 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	
125 125 a	tracked to completion and assessed for adequacy and completeness? 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.	
125 125 a	tracked to completion and assessed for adequacy and completeness? 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.	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	•

Declaration Statement	
	pence Questionnaire 2023 (CBDDQ V1.4) Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of er, Global Head of Financial Crimes Compliance OR equivalent)
Joint Stock Company "StatusBank"	(Financial Institution name) is fully committed to the fight against financial crime and makes
every effort to remain in full compliance with all a	pplicable 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 legal and regulatory obligations.	importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financial Institution recognises the importan standards.	ice of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these
The Financial Institution further certifies it compli The information provided in this Wolfsberg CBDD	es with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. DQ 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, Siarhei Kozik (Act.Chairman of the Board) the answers provided in this Wolfsberg CBDDQ Institution.	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
I, Irina Soloveva	(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this
	my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.
////0	45.08.2013 (Signature & Date)
dojen d5.08	203 (Signature & Date)