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

## the Wolfsberg Group

Financial Institution Name: JSC Bank CenterCredit Location (Country) : Almaty, Kazakhstan

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	Allower
1	Full Legal Name	
		Joint Stock Company Bank CenterCredit
2	Append a list of foreign branches which are covered by this questionnaire	BCC does not have any foreign branches
	by this questionnaire	
3	Full Legal (Registered) Address	38 Al Farabi Avenue, A25D5G0, Almaty, Kazekhstan
4	Full Primary Business Address (if different from above)	same
5	Date of Entity incorporation/establishment	30 June 1998
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a 1	If Y, indicate the exchange traded on and ticker	Yes
	symbol	Kazakhstan Stock Exchange - KASE, ticker - CCBN, CCBNp, Astana International Exchange-AIX
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	Mr. Bakhytbek R. Baiseitov - 48,41% Mr. Vladislav S. Lee - 11,14%
7	% of the Entity's total shares composed of bearer shares	None
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
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	National Bank of the Republic of Kazakhstan, The Agency for Regulation and Development of Financial Market of the Republic of Kazakhstan
11	Provide Legal Entity Identifier (LEI) if available	253400SLU3Z4KE4LLA03
	Provide the full legal name of the ultimate parent (if	

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14 Select the business areas applicable to the Entity 14 a Retail Banking Yes 14 b Private Banking Yes 14 c Commercial Banking Yes 14 d Commercial Banking Yes 14 d Investment Banking Yes 14 d Investment Banking No 14 e Investment Banking No 14 e Investment Banking No 14 p Securities Services/Custody Yes 14 h Brokar/Dealer No 14 h Brokar/Dealer No 14 h Brokar/Dealer No 14 h Mulfillation Development Bank No 14 l Westh Management No 14 l Westh Management No 14 l Westh Management No 15 a Beach the Entity have a significant (10% or more) portion of the provided on the state of the state of the provided on the state of the provided of the state of the state of the provided of the state of the state of the provided of the state of the provided of the state of the state of the provided of the provided of the provided of the		<del></del>
14 a		
14 b Private Banking Yes		A SECTION OF SECTION S
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14   Investment Banking   Yes		
14   Financial Markets Trading   No     14   9   Securities Services/Custody   Yes     15   The Transcall Markets Services/Custody   Yes     14   Multilatars Development Bank   No     14   Westit Management   No     14   Westit Management   No     14   Westit Management   No     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 the hand services are provided)   15 a		<del></del>
14   Broken/Dealer   Yes     14   Multilaterial Development Bank   No     14   Multilaterial Development Bank   No     14   Westith Management   No     14   Multilaterial Development Bank   No     14   Multilaterial Development Bank   No     14   Multilaterial Development Bank   No     15   Obes 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 nears customers primarily resident in a different jurisdiction to the location where bank services are provided;     15 a		<del></del>
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14   Multilateral Development Bank   No		
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14 k Other (please explain)  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 primarily resident in a different jurisdiction to the location where bank services are provided;  15 a  16 Select the closest value:  18 Select the closest value:  19 A Number of employees  10 Number of employees  11 Number of employees  12 Confirm that all responses provided in the above Section are representative of all the LE's branches.  17 a  18 I'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.  19 a  19 a Consepondent Banking  19 at If Y  19 at 1 BY  19 at 1 BY  19 at 1 Does the Entity offer Correspondent Banking services to domestic banks?  19 at 10 Does the Entity offer Correspondent Banking services to domestic banks?  19 at 1 Does the Entity offer Correspondent Banking with domestic banks?  19 at 1 Does the Entity offer Correspondent Banking services to domestic banks?  19 at 1 Does the Entity offer Correspondent Banking services to domestic banks?  19 at 1 Does the Entity offer Correspondent Banking services to domestic banks?  19 at 2 Does the Entity offer Correspondent Banking services to foreign banks?  19 at 1 Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  19 at 2 Does the Entity allow downstream relationships with foreign banks?  19 at 3 Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  19 at 3 Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?		
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(MSBs)/Money Value Transfer Services (MVTSs)?		
0 44		
9 a1h Does the Entity allow downstream relationships	S OF THE OWNER WHEN	WINDS WATER OF STREET
with MSBs, MVTSs, or Payment Service Provider		
(PSPs)?		
9 a1h1 MSBs No	APRIL PROPERTY AND	
9 = 162		
Redby No		Pier.
No No		

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
40.6	<u> </u>	
19 b	Cross-Border Bulk Cash Delivery	No
19 C	Cross-Border Remittances	Yes
19 6	Domestic Bulk Cash Delivery	Yes
19 f	Hold Mail	No
	International Cash Letter	No
19 g 19 h	Low Price Securities	No
19 h	Payable Through Accounts	No
191	Payment services to non-bank entitles who may then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 12	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 14	eCommerce Platforms	Please select
19 15	Other - Please explain	Please select
	Ostal - Hodad oxplain	· ·
l		
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	Domestic
19 K	Sponsoring Private ATMs	No
19 m		No .
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
	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	
19 p1a	If yes, state the applicable level of due diligence	No
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Yes
19 p3	Foreign currency conversion	Identification and verification
19 p3a	If yes, state the applicable level of due diligence	Yes
44	Sale of Manatan Jackson - 1	Identification and verification
19 p4	I Sale of Monetary instruments	
19 p4 19 p4a	Sale of Monetary Instruments  If yes, state the applicable level of due diligence	No Please select
	If yes, state the applicable level of due diligence If you offer other services to walk-in customers	No Please select
19 p4a	If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
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19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 c 22 d 22 g	If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the 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.  F & 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	Please select  Bank CenterCredit JSC provides to walk-in customers with services related to remittance through Western Union and Zolotaya Corona but we identify the client and on mandatory basis monitor transactions processed through the above systems.  Yes  Yes  Yes  Yes  Yes  Yes  Yes
19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 f 22 g 22 h	If yes, state the applicable level of due diligence  If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the 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.  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  CDD  Independent Testing Periodic Review	Please select  Bank CenterCredit JSC provides to walk-in customers with services related to remittance through Western Union and Zolotaya Corona but we identify the client and on mandatory basis monitor transactions processed through the above systems.  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 p4a 19 p5 19 q 20 20 a 21 2 a 2 b 2 c 2 d 2 e 2 f 2 g 2 h 2 l	If yes, state the applicable level of due diligence  If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the 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.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Senctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Please select  Bank CenterCredit JSC provides to walk-in customers with services related to remittance through Western Union and Zolotaya Corona but we identify the client and on mandatory basis monitor transactions processed through the above systems.  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 p4a 19 p5 19 q 20 a 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 p 21 21 22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the 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.  F. & 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  PEP Screening	Please select  Bank CenterCredit JSC provides to walk-in customers with services related to remittance through Western Union and Zolotaya Corona but we identify the client and on mandatory basis monitor transactions processed through the above systems.  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 p4a 19 p5 19 q 20 a 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 p 21 21 22 j	If yes, state the applicable level of due diligence  If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the 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.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Senctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Please select  Bank CenterCredit JSC provides to walk-in customers with services related to remittance through Western Union and Zolotaya Corona but we identify the client and on mandatory basis monitor transactions processed through the above systems.  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 p4a 19 p5 19 q 20 20 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the 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.  F. & 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  PEP Screening	Please select  Bank CenterCredit JSC provides to walk-in customers with services related to remittance through Western Union and Zolotaya Corona but we identify the client and on mandatory basis monitor transactions processed through the above systems.  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y

22 -	Complete and the first	
22 m	Suspicious Activity Reporting Training and Education	Yes
22 0	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's	Yes
	AML, CTF & Sanctions Compliance Department?	11-100
24	is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	İ
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	<u> </u>
-	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.	
29	ff appropriate, provide any additional information/context to the answers in this section.	AML, CTF, & Sanctions policy reviewed and updated as necessary, including in connection in the legislation of the Republic of Kazakhstan, as well as changes in international practice, norms and recommendations in the field of AML/CTF.
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:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	Sour John Assistance and mind basses actived ou pensit of the Futily
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.	75 75
	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
	Does the Entity's ABC EWRA cover the Inherent risk	
0 a	components detailed below:  Potential liability created by intermediaries and	Yes

40.1		
40 Ь	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
40 d	Corruption risks associated with gifts and hospitality, hidng/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:	EAST CONTRACT CONTRAC
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 ¢	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 •	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
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.	:
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AMI C	TF & SANCTIONS POLICIES & PROCEDURES	AND ADDRESS OF THE PARTY OF THE
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?	No
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	No
49	Does the Entity have policies and procedures that:	WASTERSON NOT THE CONTRACTOR OF THE PARTY OF
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 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 services to shell banks	Yes
49 f		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

491	Define the process for exact the formal	
	Define the process for escalating financial crime ris 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
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 relationship	Yes
49 m	Outline the processes regarding screening for senctions, PEPs and Adverse Media/Negative New	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?	
	<u> </u>	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.	
53	If appropriate, provide any additional information/context to the answers in this section.	
		0
6. AML, CT	F & SANCTIONS RISK ASSESSMENT	
6. AML, CT 54	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel	Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography	Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 65 65 65 65 65 65 65 65	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a  54 a  54 b  54 c  54 d  55 c  55 a  55 c  55 d  55 c  55 f  55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a  54 a  54 b  54 c  54 d  55 c  55 c  55 d  55 c  55 f  55 g  55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 c 55 f 55 6	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 s 65 f 55 f 57 7	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 s 65 f 55 g 65 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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
54 a 54 a 54 a 55 b 55 c 55 c 55 c 55 c 55 f 55 c 55 f 55 c 55 f 55 c 55 f 55 c 57 c 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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	Yes
54 a  54 a  54 b  54 c  54 c  55 d  55 c  55 c  55 c  55 f  55 g  55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 s 65 6 57 c 57 a 57 a 57 c 57 d 88	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative 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
54 a 54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 c 57 c 57 a 57 a 57 d 88	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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
54 a 54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 s 55 f 55 a 55 f 57 a 57 a 57 a 57 d 88 88 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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 Governance	Yes
54 a 54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c 55 f 55 c 57 c 57 a 57 a 57 d 88	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence 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

	Nama Carrella	
58 a 58 f	Name Screening	Yes
58 g	Transaction Screening	Yes
59 g	Training and Education	Yes
23	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a		105
32 a	If N, provide the date when the last Sanctions EWRA was completed.	
[	ETTON Was completed.	
	III	
60	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
i	and the branch/es that this applies to.	28
ĺ		
61	If appropriate, provide any additional	
	information/context to the answers in this section.	
7. KYC,	CDD and EDD	CONTRACTOR OF CO
62	Does the Entity verify the identity of the customer?	Man
63	Do the Entity's policies and procedures set outwhen	Yes
	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	193
64	Which of the following does the Entity gather and	
	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes Yes
64 e	Product usage	
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:	Yes
85 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	Yes
55 b	Authorised signatories (where applicable)	Yes
35 c	Key controllers	Yes
35 d	Other relevant parties	Yes
36	What is the Entity's minimum (lowest) threshold	Yes
	applied to beneficial ownership identification?	25%
37	Does the due diligence process result in customers	<del> </del>
	receiving a risk classification?	Yes
7 a	If Y, what factors/criteria are used to determine the	THE SAME AND A STATE OF THE SAME OF THE SA
	customer's risk classification? Select all that apply:	A STATE OF THE PARTY OF THE PAR
7 a1	Product Usage	Marie 1 Carlos Marie
7 a2	Geography	Yes
7 a3	Business Type/Industry	Yes
7 a4	Legal Entity type	Yes
7 a5	Adverse Information	Yes
7 a6	Other (specify)	Yes
		When an entity is included into the list complied by an authorised government body
		And an annual Angel Hillie Both
	}	
В	For high risk non-individual	
8	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
	part of your KYC process?	Yes
B a	part of your KYC process?  If Y, is this at:	1200 Constitution of the second secon
8 a 8 a1	part of your KYC process?  If Y, is this at:  Onboarding	Yes
8 a 8 a1 8 a2	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal	Yes Yes
8 a 8 a1 8 a2 8 a3	part of your KYC process?  If Y, is this at: Onboarding  KYC renewal  Trigger event	Yes Yes Yes
8 a B a 1 B a 2 B a 3 B a 4	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other	Yes Yes
8 a 8 a1 8 a2 8 a3	part of your KYC process?  If Y, is this at: Onboarding  KYC renewal  Trigger event	Yes Yes Yes
8 a B a 1 B a 2 B a 3 B a 4	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other	Yes Yes Yes
8 a B a 1 B a 2 B a 3 B a 4	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other	Yes Yes Yes
8 a B a 1 B a 2 B a 3 B a 3 B a 4 B a 3 B a 4 B a 3 B a 4 B a 3 B a 4 B a 5 B a 6 B	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other  If yes, please specify "Other"	Yes Yes Yes
8 a B a 1 B a 2 B a 3 B a 4	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other  If yes, please specify "Other".	Yes Yes Yes
8 a B a 1 B a 2 B a 3 B a 3 B a 4 B a 3 B a 4 B a 3 B a 4 B a 3 B a 4 B a 5 B a 6 B	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other  If yes, please specify "Other".  Does the Entity have a risk based approach to screening customers for Adverse Media/Negative	Yes Yes Yes
8 a 8 a 1 8 a 2 8 a 3 3 a 4 8 3 a 4 a	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other  If yes, please specify "Other".  Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes Yes Yes No
8 a 8 a 1 3 a 2 5 a 3 3 a 4 3 a 4 a 3 a 4 a	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other  If yes, please specify "Other".  Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  If Y, is this at:	Yes Yes Yes No
8 a 8 a 1 8 a 2 8 a 3 3 a 4 8 3 a 4 a	part of your KYC process?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  Other  If yes, please specify "Other"  Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?  If Y, is this at:	Yes Yes Yes No

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	163
71	Adverse Media/Negative News?	Automated
	Does the Entity have a risk based approach to screenin customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	g ar Yes
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?	Automated
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:	ESTATION FOR MICH. STOCKED COMMENT.
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	No
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
5	Other (Please specify)	
	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
'6 	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?	
6 a	Arms, defence, military	Restricted
6 b	Respondent Banks	
<b>6</b> b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	EDD on risk-based approach Yes
6 c	Embassies/Consulates	EDD on risk-based approach
βd	Extractive industries	
3 e	Gambling customers	EDD on risk-based approach Restricted
3 1	General Trading Companies	<del></del>
3 g	Marijuana-related Entities	EDD on risk-based approach
<u></u>	MSRANTS quaternass	Prohibited
31	Non-propert eveters	EDD on risk-based approach
31	Non-Government Over-land	EDD on risk-based approach
, <u>, , , , , , , , , , , , , , , , , , </u>	Non-meidost sustament	EDD on risk-based approach
	Non-resident customers	EDD on risk-based approach
m	Nuclear power	Restricted
	Payment Service Providers	EDD on risk-based approach
n	PEP8	EDD on risk-based approach
0	PEP Close Associates	EDD on risk-based approach
Р	PEP Related	EDD on risk-based approach
q	Precious metals and stones	EDD on risk-based approach
r	Red light husinesses that the second second	Prohibited
	Permitted should a	Restricted
t	Chatthaute	Prohibited
u	Terrol and Town Co.	
v	Upperculated aboutton	EDD on risk-based approach
w	Head Course	Prohibited
x	Virtual Assat Sandon Provident	EDD on risk-based approach
у	Other (specify)	Prohibited
	If restricted, provide details of the restriction	or these type of operations Bank applies enhanced comprehensive check. Bank does not carry perations with marijuana and virtual currency.
	Does EDD require senior business management and/ or compliance approval?	98

70 -	ACM Seatter as the sea of the set	
78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for	
	onboarding entities that handle client money such as	No
	lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or	No.
	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	
!		
82	If appropriate, provide any additional	
	information/context to the answers in this section.	
	The state of the s	
1		
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures	-
• •	and monitoring processes for the identification and	Yes
	reporting of suspicious activity?	
84	What is the method used by the Entity to monitor	
	transactions for suspicious activities?	Automated
	<u> </u>	
84 a	If manual or combination selected, specify what	
	type of transactions are monitored manually	
	If automated or combination selected, are internal	
84 b	system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	Market and a second and a second as the seco	
84 D1	If 'Vendor-sourced tool' or 'Both' selected, what is	Prime Source
	the name of the vendor/tool?	
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring	- 1 vone
	application last calibrated?	< 1 year
	B	
85	Does the Entity have regulatory requirements to	Yes
	report suspicious transactions?	
05 -	If V does the Estituteur policies accordance and	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	Vaa
	reporting requirements?	Yes
	Toporting requirements:	
86	Does the Entity have policies, procedures and	
00	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	Yes
	in a timely manner?	<u> </u>
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in	Yes
	a timely manner?	
90	Confirm that all responses provided in the above	
-	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	
	and and an	
	ł	
**		
91	If appropriate, provide any additional	
	information/context to the answers in this section.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes
		<u> </u>

-		
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	
93 b1	If Y, specify the regulation	Yes Internal Control Rules and Risk Level Assessment Methodology
93 c	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	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N.
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	CTIONS	NAME OF THE PROPERTY OF THE PARTY OF THE PARTY.
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with senctions 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?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a Vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Prime Sourse
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
103	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

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)	The Sanction list of the Republic of Kazakhstan
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.	
110	If appropriate, provide any additional information/context to the answers in this section.	i a
	TISC at	
11. TRAINI	ING & EDUCATION	
11. TRAINI 111	ING & EDUCATION  Does the Entity provide mandatory training, which includes:	
	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities	Yes
111	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to	Yes
111 a	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant.	
111 a 111 b	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering.	Yes
111 a 111 b 111 c 111 d	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant	Yes
111 a 111 c 111 d 111 d	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud	Yes Yes
111 a 111 a 111 c 111 d 111 d 111 f 111 f	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:	Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 f 111 f 112 a	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes Yes Yes Yes
111 a  111 a  111 c  111 d  111 d  111 e  111 f  112 a  112 b	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes
111 a 111 a 111 b 111 c 111 d 111 f 112 a 112 b 112 c	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
111 a  111 a  111 c  111 d  111 d  111 e  111 f  112 a  112 b	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations.  New issues that occur in the market, e.g. significant regulatory actions or new regulations.  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have	Yes
111 a  111 a  111 c  111 d  111 f  112 c  112 c  112 d	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and senctions violations.  New issues that occur in the market, e.g. significant regulatory actions or new regulations.  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes
111 a  111 a  111 b  111 c  111 d  111 f  112 b  112 b  112 c  112 d	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations.  New issues that occur in the market, e.g. significant regulatory actions or new regulations.  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
111 a  111 a  111 b  111 c  111 d  111 e  111 f  112 a  112 b  112 c  112 c	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and senctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senlor Committee Management  1st Line of Defence  2nd Line of Defence  3nd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML.  CTF and Sanctions staff?	Yes
111 a  111 a  111 b  111 c  111 d  111 f  112 b  112 c  112 d  112 d	Does the Entity provide mandatory training, which includes:  identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and senctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and senctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML.	Yes

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
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116	Monare data and day	
110	If appropriate, provide any additional information/context to the answers in this section.	
	morning of the different water and sweets in this section.	
42 OHALI	TV ADDUDANCE IN COLOR	
117	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	Yes
119 a	If N, clarify which questions the difference/s relate to	<del></del>
	and the branch/es that this applies to.	
		€ (
120	If appropriate, provide any additional	
	information/context to the answers in this section.	
	<u></u>	
13. AUDIT		
121	in addition to inspections by the government	10-44 - 10-44 - 10-10-10-10-10-10-10-10-10-10-10-10-10-1
	supervisors/regulators, does the Entity have an	
	internal audit function, a testing function or other independent third party, or both, that assesses FCC	l Man
	AML, CTF, ABC, Fraud and Sanctions policies and	Yes
	practices on a regular basis?	
122		the state of the s
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	
122 b	External Third Party	Compenent-based reviews
123	Does the internal audit function or other independent	Component-based reviews
	third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 ¢	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
23 •	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
23 g	Suspicious Activity Filing	Yes
23 h	Technology	Yes
23	Transaction Monitoring	Yes
23 j	Transaction Screening including for sanctions	Yes
23 k	Training & Education	Yes
231	Other (specify)	
24	Are advance findings from 1	
~7	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy	
	and completeness?	Yes
25	Confirm that all responses provided in the above	
	section are representative of all the LE's branches	Yes
	If N, clarify which questions the difference/s relate to	
25 a	deservite die dilletauce/2 (61919 10	
25 a	and the branch/es that this applies in 1	
25 a	and the branch/es that this applies to.	
25 a	and the branch/es that this applies to.	
25 a 26	If appropriate, provide any additional	
	If appropriate, provide any additional	
	If appropriate, provide any additional	
26	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.	
26 J. FRAUC	if appropriate, provide any additional information/context to the answers in this section.  Does the Entity have policies in place addressing fraud risk?	Yes
26 J. FRAUC	if appropriate, provide any additional information/context to the answers in this section.  Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible	Yes Ves

## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) VI.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.	
132	If appropriate, provide any additional information/context to the answers in this section.	Fraud risk management is provided throughout the entire operational process using automated systems, as well as all possible additional sources of information.
Wolfsberg Gre Declaration S	On Statement  Dup Correspondent Banking Due Diligence Questionnaire 2023 (CB Statement (To be signed by Global Head of Correspondent Bank Laundering, Chief Compliance Officer, Global Head of Financial (	the expendictors and the state of the state
Joint Stock Company Bank CenterCredit		
(Financial institution name) is fully committed to the light 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 holds accounts.		
The Financial Institution understands the critical importance of beyong effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its		
The Financial Institution recognises the importance of transparency requirements to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it comples with A swarfed to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.  The Information provided in this Worlberg CBD William Rept currentains will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accordance supplemental information on a timely basis.		
I Timur Gabassov  (Global Hand of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that		
nstitution.	worked it this violate in CBDDC are complete and defrect to r	Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Zhanat Seldaliyevy (MI RO or equivelent) could that I be a		
Volfsberg C8	DDO are complete and correct to my honest belief, and that I are	ralent), certify that I have read and understood this declaration, that the answers provided in this mauthorised to execute this declaration on behalf of the Financial Institution.
07 September 2023 (Signature & Date)		
07 Septembe		·
	(Signature & Date)	

C9000Q V1.4