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

the Wolfsberg Group

Financial Institution Name: Location (Country):

Československá obchodná banka, a.s. Slovakia

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.

Append a list of foreign branches which are covered by this questionnaire	Československá obchodná banka, a.s.
Append a list of foreign branches which are covered	Československá obchodná banka, a.s.
บรู แก้ง จุนธรมบาทสักธ	all Slovak branches
Full Legal (Registered) Address	Žižkova 11, 811 02 Bratislava, Slovak Republic
Full Primary Business Address (if different from above)	
Date of Entity incorporation/establishment	1.1.2008
Select type of ownership and append an ownership chart if available	
Publicly Traded (25% of shares publicly traded)	No 🔽
If Y, indicate the exchange traded on and ticker symbol	N/A
Member Owned/Mutual	No 🔽
Government or State Owned by 25% or more	No 🔽
Privately Owned	Yes
If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	KBC Bank N.V., Brussels
% of the Entity's total shares composed of bearer shares	0
Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No 🔻
If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
Does the Bank have a Virtual Bank License or provide services only through online channels?	No 🔻
Name of primary financial regulator/supervisory authority	National Bank of Slovakia
Provide Legal Entity Identifier (LEI) if available	52990096Q5LMCH1WU462
Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	KBC Bank N.V., Brussels
	Date of Entity incorporation/establishment Select type of ownership and append an ownership chart if available Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker symbol Member Owned/Mutual Government or State Owned by 25% or more Privately Owned If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more shares Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? If Y, provide the name of the relevant branch/es which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels? Name of primary financial regulator/supervisory authority Provide Legal Entity Identifier (LEI) if available

13	Jurisdiction of licensing authority and regulator of		
4	Jurisdiction of licensing authority and regulator of ultimate parent	Belgium, National Bank of Belgium	
	Section Control of the Control of th		
14	Select the business areas applicable to the Entity		
14 a	Retail Banking	Yes	
14 b	Private Banking	Yes	7
14 c	Commercial Banking	Yes	
14 d	Transactional Banking	Yes	
14 e	Investment Banking	Yes	
14 f	Financial Markets Trading	Yes	
14 g	Securities Services/Custody	Yes	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
14 h	Broker/Dealer	Yes	7
14 i	Multilateral Development Bank	No	7
14 j	Wealth Management	No	
14 k	Other (please explain)	N/A	
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		11
	customers? (Non-resident means customers primarily	No	
	resident in a different jurisdiction to the location		11
	where bank services are provided)		
15 a	If Y, provide the top five countries where the non-	N/A	
	resident customers are located.	IN/A	
16	Select the closest value:		
16 a	Number of employees	1001-5000	
16 b	Total Assets	Greater than \$500 million	
17	Confirm that all responses provided in the above	Greater trial \$500 fillillon	
	Section are representative of all the LE's branches.	Yes	~
17 a	If N, clarify which questions the difference/s relate to		
17 a	and the branch/es that this applies to.	N/A	
	and the stationed that the applied to.		
18	If appropriate provide any additional		
10	If appropriate, provide any additional information/context to the answers in this section.	N/A	
	information/context to the answers in this section.		
a ppopi	HOTO A OFFINIORS		
CONTROL OF THE LOCKY	UCTS & SERVICES		
2. PRODU 19	Does the Entity offer the following products and		
19	Does the Entity offer the following products and services:		
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes	
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes	
19 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	Yes Yes	
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?		□
19 19 a 19 a1	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		□ □ □
19 a 19 a 19 a1 19 a1a 19 a1b	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?	Yes	□ □ □
19 a 19 a 19 a1 19 a1a	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	Yes No	
19 a 19 a 19 a1 19 a1a 19 a1b	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	Yes	□ □ □ □ □ □ □ □ □ □
19 a 19 a 19 a1 19 a1a 19 a1a 19 a1b	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?	Yes No	✓✓✓
19 a 19 a 19 a1 19 a1a 19 a1b	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	Yes No	
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	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?	Yes No	- - -
19 a 19 a 19 a1 19 a1a 19 a1a 19 a1b	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	Yes No No Yes	
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	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?	Yes No	\ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	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?	Yes No No Yes No	
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	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	Yes No No Yes	\ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e	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?	Yes No No Yes No	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d	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 downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes No No Yes No	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e	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	Yes No No Yes No	
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d	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 forer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes No No Yes No Yes	\ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1e	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	Yes No No Yes No Yes	\ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d	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 with MSBs, MVTSs, or Payment Service Provider	Yes No No Yes No Yes	\ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1d	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	Yes No No Yes No Yes	\ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1f 19 a1f 19 a1f 19 a1f	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 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)?	Yes No No Yes No Yes	\ \ \ \ \ \ \ \
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f 19 a1f	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 with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes No No Yes No Yes No	\ \ \ \ \ \ \ \

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes	•
19 b	Cross-Border Bulk Cash Delivery	No I	
19 c	Cross-Border Remittances	Yes	_
19 d	Domestic Bulk Cash Delivery	No	_
19 e	Hold Mail	No	_
19 f	International Cash Letter	Yes	
19 g	Low Price Securities	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	Please select	
19 i3	Virtual Asset Service Providers (VASPs)	Please select	
19 i4	eCommerce Platforms	Please select	
19 i5	Other - Please explain		
19 j	Private Banking	Please select	
19 k	Remote Deposit Capture (RDC)	Please select	
19 I	Sponsoring Private ATMs	Please select	
19 m	Stored Value Instruments	Please select	
19 n	Trade Finance	Please select	
19 o	Virtual Assets	Please select	
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 I	_
19 p1a	If yes, state the applicable level of due diligence	Please select	
19 p2	Wire transfers		_
19 p2a	If yes, state the applicable level of due diligence	Please select	
19 p3	Foreign currency conversion		
19 p3a	If yes, state the applicable level of due diligence	Please select	
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.	N/A	
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes	v
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
21	If appropriate, provide any additional information/context to the answers in this section.	N/A	
3. AMI	CTF & SANCTIONS PROGRAMME		97
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		
22 b	Adverse Information Screening	Yes	_
22 c	Beneficial Ownership	Yes	
22 d	Cash Reporting	Yes	-
22 e	CDD	Yes	
22 f	EDD	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		~
22	Sanctions	Yes	

22 m	Suspicious Activity Reporting	Yes	
22 n	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	Yes	~
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.	Internal policy is udpated and approved by Board of Directors on yearly basis.	
4. ANTI	I 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	T
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	-
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	_
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	-
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	-
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	<u> </u>
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	T
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	T
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	v
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	v
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	
42 b	1st Line of Defence	Yes	
42 c	2nd Line of Defence	Yes	
42 d	3rd Line of Defence	Yes	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	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.		
- ABB 0	TE & CANOTIONS BOLISIES & BROOFFILES		
personal and the Party of the same	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	v
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?	Not Applicable	
48 b	EU Standards	Yes	
48 b1	If Y, does the Entity retain a record of the results?	Yes	
49	Does the Entity have policies and procedures that:		
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	Yes	
49 e	Prohibit dealing with another entity that provides	Yes	-
43 6	services to shell banks	163	_
49 f		Yes	▼
	services to shell banks Prohibit opening and keeping of accounts for		▼ ▼

49 i	Define the process for escalating financial crime risk		
	issues/potentially suspicious activity identified by employees	Yes	*
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	~
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	~
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	~
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	~
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	~
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	•
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	T
51 a	If Y, what is the retention period?	5 years or more	<u></u>
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.	to 48a - bank check only US sanctions, but do not compare policies and procedures to US standards. Bank is under EU regulations.	
6 AML CT	FF & SANCTIONS RISK ASSESSMENT		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	
54 b	Product	Yes	
54 c	Channel	Yes	Y
54 d 55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes	
55 a	Transaction Monitoring	Yes	
55 b	Customer Due Diligence	Yes	
55 c	PEP Identification	Yes	Y
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative	Yes	믐
	News	Yes	_
55 f	Training and Education	Yes	
55 g	Governance	Yes	
55 h 56	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes	▼
56 а	If N, provide the date when the last AML & CTF EWRA was completed.	EWRA was completed in Q12023.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	
57 b	Product	Yes	
57 с	Channel	Yes	
57 d	Geography	Yes	
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	Y
58 b			
50 0	Governance List Management	Yes	~
58 c 58 d	List Management Management Information	Yes Yes	

E9 0	Nama Saraanina	Van	
58 e 58 f	Name Screening	Yes	
58 f	Transaction Screening Training and Education	Yes Yes	
58 g 59	Has the Entity's Sanctions EWRA been completed in	Yes	
59	the last 12 months?	Yes	*
59 a	If N, provide the date when the last Sanctions EWRA was completed.	EWRA was completed in Q12023.	
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 and the branch/es that this applies to.		
61	If appropriate, provide any additional information/context to the answers in this section.	,	
7. KYC. 0	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	7
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	A
65 b	Authorised signatories (where applicable)	Yes	Y
65 с	Key controllers	Yes	
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes 25%	₩
67	applied to beneficial ownership identification? 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 a2	Business Type/Industry	Yes	
67 a4	Legal Entity type	Yes	一
67 a5	Adverse Information	Yes	~
67 a6	Other (specify)		
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	~
68 a	If Y, is this at:		_
68 a1	Onboarding	Yes	Y
68 a2	KYC renewal	Yes	
68 a3	Trigger event	Yes	
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 69 a1	If Y, is this at: Onboarding	Van	
	KYC renewal	Yes	
69 a2	KYC renewal	Yes	

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		or compliance approval?	105	_

The content of the second procedures for oncharting entities that handle cleint money such as lawyers, accountants, consultants, real settle agents? Does the Entity hardward and distinct agents? Fig. Candify which guestions the difference's relate to and the branches the difference's relate to another the design of the design	78 a	If Y indicate who provides the approval:	Both	
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quality roview on clients subject to EDD? Yes 1 Confirm that all responses provided in the above Section are representative of all the LES branches 11 a	,,	onboarding entities that handle client money such as	No	*
Section are representative of all the LES branches 11 a	80		Yes	•
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processes to comply with suspicious transaction reporting requirements? 86 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 87 Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? 88 Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? 89 Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? 90 Confirm that all responses provided in the above Section are representative of all the LE's branches 91 If N, clarify which questions the difference/s relate to and the branch/es that this applies to 91 If appropriate, provide any additional information/context to the answers in this section.	85		Yes	T
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programme to ensure that complete data for all transactions are subject to monitoring? 88 Does the Entity have processes in place to respond to Request For Information (RFis) from other entities in a timely manner? 89 Does the Entity have processes in place to send Requests for Information (RFis) to their customers in a timely manner? 90 Confirm that all responses provided in the above Section are representative of all the LE's branches 90 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to 91 If appropriate, provide any additional information/context to the answers in this section. 92 Does the Entity adhere to the Wolfsberg Group	86	processes to review and escalate matters arising from	Yes	•
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Section are representative of all the LE's branches 90 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to 91 If appropriate, provide any additional information/context to the answers in this section. 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group	89	Requests for Information (RFIs) to their customers in	Yes	~
and the branch/es that this applies to 91	90		Yes	•
information/context to the answers in this section. 9. PAYMENT TRANSPARENCY 92 Does the Entity adhere to the Wolfsberg Group	90 a			
92 Does the Entity adhere to the Wolfsberg Group	91			
92 Does the Entity adhere to the Wolfsberg Group	9. PAYME	NT TRANSPARENCY		
Payment Transparency Standards?	92	Does the Entity adhere to the Wolfsberg Group	Vac	-
		Payment Transparency Standards?	100	

02	Door the Cutity have notice		
93	Does the Entity have policies, procedures and processes to comply with and have controls in place		
00 -	to ensure compliance with:		
93 a	FATF Recommendation 16	Yes	
93 b	Local Regulations	Yes	
93 b1 93 c	If Y, specify the regulation If N, explain	AML Act 297/2008 Z. z. o ochrane pred legalizáciou príjmov z trestnej činnosti a o ochrane pred financovaním terorizmu a ozmene a doplnení niektorých zákonov. Act on sanctions 289/2016 Z. z. o vykonávaní medzinárodných sankcií a o doplnení zákona č. 566/2001 Z. z. o ocenných papieroch a investičných službách a o zmene a doplnení niektorých zákonov (zákon o cenných papieroch) v znení neskorších predpisov;	
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.		
97	If appropriate, provide any additional information/context to the answers in this section.		
10. SANO	CTIONS		
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?	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?	Worldcheck, NetReveal (embargo 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	
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions	Yes v	
	against Sanctions Lists?		

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 с	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	Not used	
106 f	Other (specify)	Local internal and external lists.	
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	v
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	~
109 а	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.		
11. TRAINII 111	NG & EDUCATION Does the Entity provide mandatory training, which		-334
	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 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	V
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 2nd Line of Defence	Yes	믇
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Yes Yes	~
112 a	Third parties to which specific FCC activities have	100	一
	been outsourced	Yes	~
112 f	Non-employed workers (contractors/consultants)	Yes	늗
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?	Other	
115	Confirm that all responses provided in the above	Yes	J
	Section are representative of all the LE's branches	103	Ť

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.	
12. QUALIT	Y 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 а	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.	
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 \blacktriangledown
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	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)	Tes
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes v
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUI		
127	Does the Entity have policies in place addressing	Yes 🔻
128	Does the Entity have a dedicated team responsible	Yes

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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.	
Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
every effort The Financia legal and reg	to remain in full compliance with all applicable financial crime laws al Institution understands the critical importance of having effective gulatory obligations.	tion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles.		
	tion provided in this Wolfsberg CBDDQ will be kept current and v al Institution commits to file accurate supplemental information on	
I, Erika Šolíková (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
, Peter Sálek (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDO are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
	12.5. 2025 (Signature & Date (le)
12,5° 2025 (Signature & Date)		