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



Financial Institution Name: Location (Country) :

NIBC Bank N.V. The Netherlands

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. ENTIT	Y & OWNERSHIP	
1	Full Legal Name	
Ī		NIBC Bank N.V.
•	Annual a list of fermion broads a cultish are account	
2	Append a list of foreign branches which are covered by this questionnaire	NIBC Bank N.V London
	by this questionnaire	NIBC Bank N.V Brussels
		NIBC Bank N.V Frankfurt
3	Full Legal (Registered) Address	Carnegieplein 4
		2517 KJ The Hague
		The Netherlands
4	Full Primary Business Address (if different from	
-	above)	
	455.57	
5	Date of Entity incorporation/establishment	31-10-1945
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
o a i	symbol	
	Symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	No shareholders or ultimate beneficial owners with
		a holding of 10% or more
7	% of the Entity's total shares composed of bearer	
l'	shares	0
	Sildles	U
8	Does the Entity, or any of its branches, operate under	No
	an Offshore Banking License (OBL)?	INU
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	
5	provide services only through online channels?	No
40	ļ	
10	Name of primary financial regulator/supervisory	De Nederlandsche Bank (DNB)
	authority	Autoriteit Financiële Markten (ÁFM)
11	Provide Legal Entity Identifier (LEI) if available	DOADOVALD ICAANINDOLIOA
		B64D6Y3LBJS4ANNPCU93
12	Drovide the full legal name of the ultimate warms of	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	NIBC Holding N.V.
	unierent nom the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of	NL NL
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	No
14 e	<u> </u>	
_	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
	· ·	100
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? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
I		
16	Select the closest value:	
16 a	Number of employees	501-1000
16 b	Total Assets	Between \$10 and \$100 million
17		Detween \$10 and \$100 million
17	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	Please select
1	services to domestic banks?	1 10000 001001
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	Please select
10.01-	, .	
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Please select
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	
	services to foreign banks?	Please select
10 -1:	<u> </u>	
19 a1e	Does the Entity allow downstream relationships	Please select
<u></u>	with foreign banks?	. 10000 501501
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Plassa salart
	foreign banks?	Please select
	y .	
19 a1g	Does the Entity offer Correspondent Banking	
_	services to regulated Money Services Businesses	Please select
	(MSBs)/Money Value Transfer Services (MVTSs)?	
10 015		
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSs	Please select
		I Di I I I
19 a1h3	PSPs	Please select

19 a1i	Does the Entity have processes and procedures	
I	in place to identify downstream relationships with	Please select
	MSBs /MVTSs/PSPs?	i idade delett
	IVIODS /IVIV TOS/T OT S:	
19 b	Cross-Border Bulk Cash Delivery	Please select
19 с	Cross-Border Remittances	Please select
19 d	Domestic Bulk Cash Delivery	Please select
19 e	Hold Mail	Please select
19 f	International Cash Letter	Please select
19 g	Low Price Securities	Please select
19 h	Payable Through Accounts	Please select
19 i	Payment services to non-bank entities who may	Treade delect
191	then offer third party payment services to their	Please select
	customers?	
19 i1	If V mineral colored all these armini halance	
	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
		Prease select
19 i5	Other - Please explain	
I		
I		
10 i	Private Banking	Please select
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		1 10000 00100t
19 þ	For each of the following please state whether you offer the service to walk-in customers and if so, the	
I	applicable level of due diligence:	
10 m1	Check cashing service	Plane relat
19 p1	<u> </u>	Please select
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Please select
	, , , , , , , , , , , , , , , , , , , ,	
19 p3	Foreign currency conversion	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	Please select
19 p4a	If yes, state the applicable level of due diligence	Please select
		Piease select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
21	and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.	
	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C1	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, C7	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:	
3. AML, C1	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:	Yes
3. AML, C7 22 22 a	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	
3. AML, C7 22 22 a 22 b	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  Adverse Information Screening	Yes
3. AML, C7 22 22 a 22 b 22 c	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  Adverse Information Screening  Beneficial Ownership	
3. AML, C7 22 22 a 22 b	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  Adverse Information Screening	Yes
3. AML, CT 22 22 a 22 b 22 c 22 d	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting	Yes Yes Not applicable
3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	Yes Yes Not applicable Yes
3. AML, C7 22 22 a 22 b 22 c 22 d 22 e 22 f	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD	Yes Yes Not applicable
3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	Yes Yes Not applicable Yes
3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If a SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	Yes Yes Not applicable Yes Yes Yes Yes
3. AML, C1 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review	Yes Yes Not applicable Yes Yes Yes Yes Yes Yes
3. AML, C1 22 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If a SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	Yes Yes Not applicable Yes Yes Yes Yes
3. AML, C1 22 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review	Yes Yes Not applicable Yes Yes Yes Yes Yes Yes Yes Yes
3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	Yes Yes Not applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes
3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j 22 k	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening  Risk Assessment	Yes Yes Not applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	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  Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	Yes Yes Not applicable Yes Yes Yes Yes Yes Yes Yes Yes Yes

22 m	Suspicious Activity Reporting	Voc
22 m 22 n	Training and Education	Yes
22 n 22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	No
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?	Yes
26 a	If Y, provide further details	For mortgage activities, the onboarding is partly outsourced to a service provider which is AML regulated and supervised itself.
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.	AML, CFT and Sanctions policy are approved by the the Risk Management Committee (of which the CRO is the chairman) every two years. Regulatory changes are monitored on a continuous basis, and policies are adjusted during the two years cycle if necessary.
4. ANTIE	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

Consuption risks associated with the countries and indistriction in which the Erity does business, including those or include in which the Erity does business, including those or public officials or state countries and hospitality, himpingmenthips, charable domains and political contributions and political contributions in the countries of th			
that involve sales-owned or state-controlled entities or public citicals or public citicals of Comption risks associated with gifts and hospitally, himpighterably, characterists consons and policiac controlucions and policiac controlucions of Comption in sections are proposed to the public controlucions and policiac controlucions of Comption in the public comption risk.  The public controlucions and public facebon or other procedures?  Does the Entity provide mandatory ABC Folicias and Procedures?  The parts as to which specific compliance activities and procedures and procedures.  The parts as to which specific compliance activities and procedures and procedures are propriets (controlucions).  The parts as to which specific compliance activities application of Definition.  The parts as to which specific compliance activities and procedures and procedure and procedures.  The parts as to which specific compliance activities and procedures and the procedure and procedure and procedures.  The parts as to which specific compliance activities and procedures are propriets (controlucions) and procedures are propriets.  The parts as to which specific compliance activities and procedures are propriets.  The parts as to which specific compliance activities and the promotely activities and procedures are propriets.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The parts are provided ABC thaining that is surgeted.  The	40 b	industries in which the Entity does business, directly	Yes
An opticital principal control bed denalors and political control bottoms  40 e Changos in business activities that may materially increases the Entity comption risk prover ABC Policies and Procedures?  41 Does the Entity is internal audit function or other independent third party over ABC Policies and Procedures?  42 Does the Entity provide mandatory ABC training to:  43 Board and senior Committee Management  44 To Statism of Defence  45 Statism of Defence  46 Statism of Defence  47 Statism of Defence  48 Statism of Defence  49 Statism of Defence  40 Statism of Defence  40 Statism of Defence  41 Statism of Defence  42 Statism of Defence  43 Does the Entity provide mandatory ABC training that is largeted to specific roles, responsibilities and activities?  44 Statism of Defence  45 Statism of Defence  46 Statism of Defence  46 Statism of Defence  47 Statism of Defence  48 Statism of Defence  49 Statism of Defence  40 Statism of Defence  40 Statism of Defence  40 Statism of Defence  40 Statism of Defence  41 Statism of Defence  42 Statism of Defence  44 Statism of Defence  45 Statism of Defence  46 Statism of Defence  46 Statism of Defence  46 Statism of Defence  46 Statism of Defence  47 Statism of Defence  48 Statism of Defence  49 Statism of Defence  49 Statism of Defence  40 Statism of Defence  41 Statism of Defence  42 Statism of Defence  44 Statism of Defence  45 Statism of Defence  46 Statism of Defence  46 Statism of Defence  47 Statism of Defence  48 Statism of Defence  49 Statism of Defence  49 Statism of Defence  40 Statism of	40 c	that involve state-owned or state-controlled entities	Yes
Increase the Entity's conruption risk  1 Does the Entity's terminal and function or other independent third party cover ABC Policies and Procedures?  22 Does the Entity provide mandatory ABC training to: 23 Board and serior Committee Management.  24 Does the Entity provide mandatory ABC training to: 24 C and Line of Defence.  25 Ves.  26 Third parties to writin's specific compliance activities subject to ABC his have been outsourced to specific roles in sponsibilities and activities subject to ABC his have been outsourced to specific roles in sponsibilities and activities to specific roles in sponsibilities and activities of specific roles in sponsibilities and activities of specific roles in sponsibilities and activities?  44 Confirm that all responses provided in the above Section are expresentabilities and activities?  45 If appropriate, provide any additional information context to the answers in this section.  46 If appropriate, provide any additional information context to the answers in this section.  46 If the SANCTIONS POLICIES & PROCEDURS  46 Has the Entity couranted policies and procedures consistent with applicable AML, CTF & Sanctions requisitions and requirements to reasonably prevent, detect and report.  46 If the sponsible and activities and act	40 d	hospitality, hiring/internships, charitable donations	Yes
independent hird party cover ABC Policies and Procedures?  22 a Board and serior Committee Management	40 e		Yes
Search and senior Committee Management   Yes	41	independent third party cover ABC Policies and	Yes
Search and senior Committee Management   Yes	42	Does the Entity provide mandatory ABC training to:	
42 c 2 value of Defence	42 a	Board and senior Committee Management	Yes
42 d. 3 due of Defence 42 d. 3 Third parties to which specific compliance activities subject to ABC in share been outcomed by specific roles; responsibilities and activities of the provided and the provided in the above specific roles; responsibilities and activities of the provided in the above specific roles; responsibilities and activities?  44 a Third parties to a provided in the above specific roles; responsibilities and activities?  45 Confirm that all responses provided in the above specific roles; responsibilities and activities?  46 a Third parties to the answers in this section.  47 If appropriate, provide any additional information/context to the answers in this section.  48 a Manual Provided any additional information/context to the answers in this section.  55 AMIL, CTF & SANCTIONS POLICIES & PROCEDURES  46 If as the Entity documented policies and procedures onesited with applicable AMIL, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report  46 a Money laundering  47 Are the Entity's policies and procedures updated at least annually?  48 The Entity spolicies and procedures updated at least annually?  48 If you can be entitled to the provider of the results?  49 If you can be entity retain a record of the results?  40 If you can be entity retain a record of the results?  40 If you can be entity retain a record of the results?  41 If you can be entity retain a record of the results?  42 Provided the Entity retain a record of the results?  43 Prohibit the pening and keeping of accounts for unilicersed banks and on NPIs  44 Prohibit depening with other entities that provide banking services to unilicersed banks  45 Prohibit depening and keeping of accounts for sponsible propering and kee		· ·	
42 e Trito parfes to which specific compliance activities subject to ABC risk have been outsourced subject to ABC risk have been outsourced (contractors/consultants)			
Third parties to which specific compliance activities   Subject to ABC in Star by been outsourced			
subject to ABC risk have been outsourced 42 f 42 f 42 f 43 Non-employed worders as appropriate (contractors/consultants) 43 Des the Entity provide ABC training that is targeted to a peofic roles, responsibilities and activities? 44 a confirm that all responses provided in the above Section are presentable of all the LES branches 44 a if N, clarify which questions the difference/is relate to and the branchies that this applies to information/context to the answers in this section.  45 If appropriate, provide any additional information/context to the answers in this section.  46 if appropriate, provide any additional information/context to the answers in this section.  5 AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 If appropriate interest in this section.  5 AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 If a Money laundering Yes to the provide any section of the yearly Systematic Integrity Risk Analysis.  5 AML to the Sanction syllations and requirements to reasonably prevent, detect and report:  46 a Money laundering Yes Yes Yes Yes The Entity Spolicies and procedures updated at least annually?  46 b Terrorist financing Yes The Entity Spolicies and procedures updated at least annually?  48 h Is the Entity Policies and procedures updated at least annually?  49 Less Sens Entity retain a record of the results?  40 Less Sens Entity retain a record of the results?  40 Less Sens Entity retain a record of the results?  40 Less Sens Entity retain a record of the results?  40 Less Sens Entity retain a record of the results?  41 Prohibit depening and keeping of accounts for undersead banks and fetilistic and and of NBFs and and fetilistic and and the prohibit the opening and keeping of accounts for undersead banks and fetilistic and provides banking services to shell banks  45 Prohibit dealing with archer aprilist that provide banking services to shell banks  46 Prohibit dealing with archer resities that provide banking services to shell banks  47 Prohibit dealing with archer resities that provide banking services to she			Yes
(contractors/consultants)  43		subject to ABC risk have been outsourced	Not Applicable
to specific roles, responsibilities and activities?  44 a If N. clarify which questions the difference/s relate to and the branch/se that this applies to and the branch/se that the section.  45 If appropriate, provide any additional information/context to the answers in this section.  5. AML, CTF & 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  48 Noney laundering  49 Are the Entity spolicies and procedures updated at least annually?  48 Has the Entity chosen to compare its policies and procedures appliant annually and the procedures applies to	42 f	1 ' '	Yes
Section are representative of all the LE's branches  44 a	43		Yes
and the branch/es that this applies to.  45 If appropriate, provide any additional information/context to the answers in this section.  46 If appropriate, provide any additional information/context to the answers in this section.  5. AML, CTF & SANCTIONS POLICIES & PROCEDURES  46 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, delect 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?  48 Has the Entity chosen to compare its policies and procedures against Procedures has a U.S. Standards  49 a U.S. Standards  49 Dees the Entity retain a record of the results? Yes  49 Dees the Entity have policies and procedures that Prohibit the enjing and keeping of accounts for unicensed banks and/or NBFIs  49 C Prohibit dealing with other entities that provide banking services to shell banks  49 C Prohibit dealing with another entity that provides services to shell banks  49 C Prohibit dealing with another entity that provides services to shell banks  49 C Prohibit dealing and keeping of accounts for any of unicensed banks and/or NBFIs  49 C Prohibit dealing with another entity that provides services to shell banks  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohibit dealing and keeping of accounts for any of unicensed/unregulated remittance agents.  49 C Prohib	44	· ·	Yes
information/context to the answers in this section.  Re q32, responsibility for ABC lies with the Compliance team. NIBCs to small to have a designated ABC officer. The ABC risk assessment is part of the yearly Systematic Integrity Risk Analysis.  5. AML, CTF & 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  47 Are the Entity's policies and procedures updated at least annually?  48 A Test entity's policies and procedures updated at least annually?  48 A U.S. Standards  48 A U.S. Standards  48 A U.S. Standards  48 A U.S. Standards  49 B Does the Entity retain a record of the results?  49 C Prohibit the opening and keeping of anconymous and fictitious named accounts  49 C Prohibit dealing with other entities that provide banking services to unlicensed banks  49 C Prohibit dealing with other entities that provides services to sell-banks  49 C Prohibit dealing with another entity that provides services to sell-banks  49 C Prohibit dealing with another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entities that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth another entity that provides services to sell-banks  49 C Prohibit dealing myth denesticand foreign PEPs, including their family and close	44 a		
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?  48 Has the Entity's policies and procedures updated at least annually?  48 Has the Entity's policies and procedures updated at policies and procedures against:  48 a U.S. Standards 48 a U.S. Standards 48 b EU Standards 48 b If Y, does the Entity retain a record of the results?  49 Does the Entity retain a record of the results?  49 Does the Entity have policies and procedures that:  49 a Prohibit the opening and keeping of anonymous and fictitious named accounts  49 b Prohibit dealing with other entities that provide banking services to unlicensed banks 49 c Prohibit dealing with other entities that provide sarvices to shell banks 49 d Prohibit designated entities 49 f Prohibit designated entities 49 g Prohibit topening and keeping of accounts for unlicensed banks and/or NBFIs  49 p Prohibit designated entities 49 p Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de camblo, bureaux de change or money transfer agents 49 p Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de camblo, bureaux de change or money transfer agents 49 p Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de camblo, bureaux de change or money transfer agents	45		designated ABC officer. The ABC risk assessment is part of the yearly Systematic Integrity Risk
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 47 Are the Entity's policies and procedures updated at least annually?  48 Has the Entity's policies and procedures updated at least annually?  48 Has the Entity's policies and procedures updated at policies and procedures against:  48 a U.S. Standards 48 a U.S. Standards 48 a U.S. Standards 48 b U.S. Standards 48 b U.S. Standards 49 Does the Entity retain a record of the results? 49 Does the Entity retain a record of the results? 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit dealing with other entities that provide banking services to unlicensed banks 49 c Prohibit dealing with other entities that provide banking services to shell banks 49 d Prohibit designated entities 49 f Prohibit designated entities 49 g Prohibit designated entities 49 g Prohibit topening and keeping of accounts for unlicensed banks and/or NBFIs 49 g Prohibit designated entities 49 g Prohibit topening and keeping of accounts for Section 311 designated entities 49 g Prohibit topening and keeping of accounts for Section 311 designated entities 49 g Prohibit topening and keeping of accounts for Section 311 designated entities 49 g Prohibit topening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close	5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  46 a			
46 b Terrorist financing Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards 48 a1 If Y, does the Entity retain a record of the results? 48 b1 EU Standards 48 b1 If Y, does the Entity retain a record of the results? 49 Does the Entity retain a record of the results? 49 Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit the opening and keeping of accounts for unilcensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unilcensed banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 f Prohibit opening and keeping of accounts for Assess the risks of relationships with domestic and foreign PEPs, including their family and close 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close		consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46 c Sanctions violations Yes  47 Are the Entity's policies and procedures updated at least annually?  48 Has the Entity chosen to compare its policies and procedures against:  48 a U.S. Standards  48 a I If Y, does the Entity retain a record of the results?  48 b EU Standards  47 Yes  48 b EU Standards  49 Does the Entity have policies and procedures that:  49 a Prohibit the opening and keeping of anonymous and fictitious named accounts  49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  49 c Prohibit dealing with other entities that provide banking services to unlicensed banks  49 c Prohibit dealing with another entity that provides services to shell banks  49 c Prohibit dealing with another entity that provides services to shell banks  49 c Prohibit opening and keeping of accounts for Section 311 designated entities  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes	46 a	Money laundering	Yes
46 c Sanctions violations Yes  47 Are the Entity's policies and procedures updated at least annually?  48 Has the Entity chosen to compare its policies and procedures against:  48 a U.S. Standards  48 a I If Y, does the Entity retain a record of the results? Please select  48 b EU Standards  49 Does the Entity have policies and procedures that:  49 a Prohibit the opening and keeping of anonymous and fictitious named accounts  49 b Prohibit dealing with other entities that provide banking services to unlicensed banks  49 c Prohibit dealing with other entity that provides services to shell banks  49 c Prohibit dealing with another entity that provides services to shell banks  49 c Prohibit dealing with another entity that provides services to shell banks  49 c Prohibit opening and keeping of accounts for Section 311 designated entities  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  49 f Assess the risks of relationships with domestic and foreign PEPs, including their family and close Yes	46 b	Terrorist financing	Yes
Are the Entity's policies and procedures updated at least annually?  Has the Entity chosen to compare its policies and procedures against:  U.S. Standards  Bull Standards  EU Standards  FY, does the Entity retain a record of the results?  Please select  Bull Standards  FY (see the Entity retain a record of the results?  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for Section 311 designated entities  Prohibit opening and keeping of accounts for Section 311 designated entities  Prohibit opening and keeping of accounts for Section 311 designated entities  Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Pession Statistics and procedures under the please select  No  No  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  Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Pession Statistics and procedures under the sults?  No  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  Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Pession Statistics and procedures under the please select  No  Prohibit opening and keeping of accounts for any of under the please select  Pession Statistics and procedures the results?  Pession Statistics and	46 c	ū	
procedures against:  48 a U.S. Standards  If Y, does the Entity retain a record of the results?  48 b EU Standards  Yes  48 b If Y, does the Entity retain a record of the results?  49 Does the Entity have policies and procedures that:  49 a Prohibit the opening and keeping of anonymous and fictitious named accounts  49 b Prohibit dealing with other entities that provide banking services to unlicensed banks  49 c Prohibit dealing with other entities that provide banking services to unlicensed banks  49 d Prohibit dealing with another entity that provides services to shell banks  49 e Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes		Are the Entity's policies and procedures updated at	
If Y, does the Entity retain a record of the results?   Please select	48	' '	
Section 311 designated entities with domestic and foreign PEPs, including their family and close for section 311 designated entities cand procedure of the results?    Pease select   Yes	48 a	, ,	No
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 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  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  49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  49 c Prohibit dealing with other entities that provide banking services to unlicensed banks  49 d Prohibit accounts/relationships with shell banks  49 e Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes  Yes  Yes  Yes  No			
49 Does the Entity have policies and procedures that:  49 a Prohibit the opening and keeping of anonymous and fictitious named accounts  49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFls  49 c Prohibit dealing with other entities that provide banking services to unlicensed banks  49 d Prohibit accounts/relationships with shell banks  49 e Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes			
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Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Prohibit accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for Section 311 designated entities  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  Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes  Yes  No  No		Prohibit the opening and keeping of anonymous	Yes
49 c Prohibit dealing with other entities that provide banking services to unlicensed banks  49 d Prohibit accounts/relationships with shell banks  49 e Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes  Yes  No  No  No  No  No  No  No  No  No  N	49 b	Prohibit the opening and keeping of accounts for	
49 d Prohibit accounts/relationships with shell banks Yes 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes  Yes	49 с	Prohibit dealing with other entities that provide	
49 e Prohibit dealing with another entity that provides services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes	49 d		Vee
services to shell banks  49 f Prohibit opening and keeping of accounts for Section 311 designated entities  No  49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes		·	res
Section 311 designated entities  No  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  No  Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes		services to shell banks	Yes
unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close  Yes	49 f		No
foreign PEPs, including their family and close Yes	49 g	unlicensed/unregulated remittance agents,	No

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
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	Re. Q 47 AML, CFT and Sanctions policy and procedures are reviewed every two years. Regulatory changes are monitored on a continuous basis, and policies are adjusted during the two years cycle if necessary. Re. Q 49f and 49g NIBC does not provide accounts to entities
6. AML. CT	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a		
55 b	Transaction Monitoring	Yes
	Customer Due Diligence	Yes
55 c	Customer Due Diligence PEP Identification	Yes Yes
	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes
55 c 55 d 55 e	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes
55 c 55 d 55 e 55 f	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f 55 g	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f 55 g 55 h	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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f 55 g 55 h	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57	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	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 57 a 57 b 57 c	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
55 c 55 d 55 e  55 f 55 g 55 h 56  56 a  57 a 57 b 57 c 57 d 58  58 a	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 57 c 57 d 58 a 58 a	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
55 c 55 d 55 e  55 f 55 g 55 h 56  56 a  57 a 57 b 57 c 57 d 58  58 a	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

	Name Organia	T
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions	
33 a	EWRA was completed.	
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, CE	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	153
65 a	Ultimate beneficial ownership	Vee
	•	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes
67	applied to beneficial ownership identification?  Does the due diligence process result in customers	25%
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	PEP status, transparency of corporate structure
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
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	We always visit non-individual customers at their offices, irrespective of their risk classification. This happens at onboarding, but also during the ongoing relationship.
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

What is the method used by the Entity to screen for Advance Modisin-Registre Newsor? Advance Modisin-Registre Newsor? Constitute Firstly have prices or an interest of constitute of the Prices of the	69 a3	Trigger event	Yes
To Cook the Entity have a rate Abased approach to screening bey are PEPs, or controlled by PEPs?  The International Section of the Sect	70	What is the method used by the Entity to screen for	Automoted
customers and connected parties to determine whether they are PEPs, or controlled by PEPs,?  71 at If Y, is this at:  72 A KYC renewal Yes  73 B Type wont Yes  74 C What is the method used by the Entity to screen PEPs?  75 C Personal Yes  76 Does the Entity have procises, procedures and processes with the method used by the Entity to screen PEPs?  77 A L Commended parties to determine whether they are PEPs, or controlled by PEPs?  78 Is KYC renewal at defined frequencies based on risk rating ferrodic Reviews)  79 A L Les Shan one year  70 A If yes, selected in that popy:  70 A If yes, selected in that popy:  70 A Shan one year  71 A Shan one year  72 Yes  73 Does the Entity maintain and report metrics on current and past periodic for Virging revent due diligence reviews?  75 Does the Entity maintain and report metrics on current and past periodic for Virging revent due diligence reviews?  76 From the list below, which categories of outstoners or industries are subject to End and or a review of the Companion of		, and the second	Automated
71 a2 Note controling Ves 71 a2 Trigger event 72 (What is the method used by the Entity to screen PEPs? Automated  73 (What is the method used by the Entity to screen PEPs? Automated  74 (What is the method used by the Entity to screen PEPs? Automated  75 (What is the method used by the Entity to screen PEPs? Automated  76 (What is the method used by the Entity to screen PEPs? Automated  77 (What is the method used by the Entity to screen PEPs? Automated  78 (What is the method used by the Entity to screen PEPs? Automated  79 (What is the method used by the Entity to screen PEPs? Automated  79 (What is the method used by the Entity to screen PEPs? Automated  79 (What is the method used by the Entity to screen PEPs? Automated  79 (What is the What is th	71	customers and connected parties to determine whether	Yes
Yes	71 a	If Y, is this at:	
71 a) Trigger event 2 What he method used by the Entity to screen PEPs? Accordance of the processor of the p	71 a1	Onboarding	Yes
What is the method used by the Entity from politics procedures and processes to review and escalate potential matches from screening usutomers and connected gartes to deserment whether they are PEPs, or controlled by PEPs?  ***Is EYK? reviewed at defined frequencies based on risk rating (Penciolic Reviews)?  ***Is EYK? reviewed at selectial frequencies based on risk rating (Penciolic Reviews)?  ***Is EYK? reviewed at selectial frequencies based on risk rating (Penciolic Reviews)?  ***Is EYK? reviewed at selectial frequencies based on risk rating (Penciolic Reviews)?  ***Is EYK? reviewed at selectial frequencies based on risk rating (Penciolic Reviews)?  ***Is EYK? reviewed at selectial frequencies based on risk rating (Penciolic Reviews)?  ***Is EYK? reviewed at selection and paper.  ***Is Is EYK? reviewed at selection and paper.  ***Is Is EYK? reviewed at selection and paper.  ***Is Is EXECUTED A reviewed at selection are restricted, or profibilitied by the Entity EXC programment and report metrics on current and past periodic or trigger event due diligion are restricted, or profibilitied by the Entity EXC programmen?  ***For Execute Industries are subject to EDD and/or are restricted, or profibilitied by the Entity EXC programmen?  ***For Execute Industries and EXECUTED A review are restricted, or profibilitied by the Entity EXC programmen?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations Basing Principles 2022?  ***For Execute Industries BEDD assessment Corporations BeDD assessment Corporations Basing Principles 2022?  ***For Exec	71 a2		
Does the Entity twister policies, procedures and processors to review and escalate potential nations from a coresing policy and a scalate potential pto ptops or provided to ptops or provided parties to determine whether they are PEPs, or controlled by PEPs?  74. I Service product Reviews by PEPs are provided by PEPs?  74. I Service select all that apply:  75. I Service select all that apply:  76. I Service select all that apply:  77. I Service select all that apply:  78. I Service select all that apply:  79. I Service se			
usukmens and commode parties to determine whether they are PEPs, controlled by PEPs?  74. Is FYC? remewed at defined frequencies based on risk rating (Pencicia Reviews)?  75. Is Exprovement of the defined frequencies based on risk rating (Pencicia Reviews)?  76. If yes, select all that apply:  76. It Less than one year  76. Other (Please specify)  77. If Tagger-based or perpetual monitoring reviews  78. Other (Please specify)  78. Other (Please s			Automated
rating (Pendoic Revieway?)  74 a 1	73	to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
No.	74	rating (Periodic Reviews)?	Yes
1-2 years   Yes   Other (Please specify)   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Prohibited   Prohibited   Do not have this category of customer or industry   Yes   Corporate Banking; high risk, 1 year / normal risk, 2 years / low risk, 3 years   Prohibited		11.5	
Yes		-	
Yes   Other (Please specify)   Review cycle Corporate Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years   Review cycle Revi		-	
Trigger-based or perpetual monitoring reviews  Other (Flease specify)  Review cycle Corporate Banking: high risk, 1 year / normal risk, 2 years / tow risk, 3 years Review cycle Real Banking: high risk, 1 year / normal risk, 2 years / tow risk, 3 years Review cycle Real Banking: high risk, 1 year / normal risk, 2 years / tow risk, 5 years / tow			
Citier (Please specify)  Review cycle Copprate Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 5 years / Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 5 years / Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 5 years / Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 5 years / Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 5 years / low risk,	74 a5	,	
Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk, 1 year / normal risk, 2 years / low risk, 3 years Review cycle Retail Banking: high risk risk part of normal risk pa	74 a6		
and past periodic or trigger event due diligence reviews?  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?  Respondent Banks  Respondent Banks  Tribulated by the Entity's FCC programme?  To Arms, defence, military  Prohibited  Tribulated by the Entity's FCC programme?  Tribulated Contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  To C Embassies/Consulates  Do not have this category of customer or industry  Tribulated  Tribulated Companies  Do not have this category of customer or industry  Tribulated  Do not have this category of customer or industry  Tribulated  Do not have this category of customer or industry  Prohibited  Do not have this category of customer or industry  Tribulated  Do not have this category of customer or industry  Prohibited  Tribulated  Prohibited  Non-account customers  Prohibited  Prohibited  Non-account customers  Prohibited  Non-account customers  Prohibited  Tribulated  Tribulated  Do not have this category of customer or industry  Do not have this category of customer or industry  Tribulated  Prohibited  Non-account customers  Prohibited  Non-account customers  Prohibited  Tribulated  Prohibited  Do not have this category of customer or industry  Do not have this category of customer or industry  Tribulated  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Prohibited  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Prohibited  Do not have this category of customer or industry  Prohibited  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry		Cure (Freuse speedig)	
industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  76 a Arms, defence, military  76 b Respondent Banks  76 b Respondent Banks  76 b Respondent Banks  76 c Embassies/Consulates  77 c Embassies/Consulates  78 c Embassies/Consulates  78 d Extractive industries  79 correspondent Banking Principles 2022?  79 Do not have this category of customer or industry  70 c Embassies/Consulates  70 Do not have this category of customer or industry  71 c General Trading Companies  72 Do not have this category of customer or industry  73 Do not have this category of customer or industry  74 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  75 Do not have this category of customer or industry  76 Do not have this category of customer or industry  77 Do not have this category of customer or industry  78 Do not have this category of customer or industry  78 Do not have this category of customer or industry  76 Do not have this category of customer or industry  76 Do not have this category of customer or industry  77 Do not have this category of customer or industry  78 Do not have this category of customer or industry  78 Do not have this category of customer or industry  79 Do not have this category of customer or industry  70 Do not have th	75	and past periodic or trigger event due diligence	Yes
Respondent Banks   Do not have this category of customer or industry   Yes	76	industries are subject to EDD and/or are restricted, or	
If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?   For Correspondent Banking Principles 2022.   For Correspondent Banking Principles 2022.   For Correspondent Banking Principles 2022.   For Correspondent Principles 2022.   For	76 a	Arms, defence, military	Prohibited
contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  76 c Embassies/Consulates Do not have this category of customer or industry  76 d Extractive industries Prohibited Prohibited Prohibited On the have this category of customer or industry  76 g Marijuana-related Entities Prohibited Prohibited Prohibited Prohibited Prohibited Non-account customers Prohibited Payment Service Providers Do not have this category of customer or industry  76 in Non-resident customers Do not have this category of customer or industry  76 in Payment Service Providers Do not have this category of customer or industry  76 in Payment Service Providers Do not have this category of customer or industry  76 in PEPs EDD on risk-based approach PPP Close Associates EDD on risk-based approach PPP Close Associates EDD on risk-based approach PPP Related EDD on risk-	76 b	·	Do not have this category of customer or industry
Prohibited Gambling customers Do not have this category of customer or industry  Marijuana-related Entities Prohibited Prohibited MSB/MVTS customers Prohibited Non-account Customers Prohibited Non-resident customers Do not have this category of customer or industry  Nuclear power Prohibited Payment Service Providers Do not have this category of customer or industry  Do not have this category of customer or industry  Prohibited PePs EDD on risk-based approach Depto PePs EDD on risk-based approach PeP Close Associates EDD on risk-based approach PeP Related EDD on risk-based approach PeP Related EDD on risk-based opproach PeP Related EDD on thave this category of customer or industry  Prohibited Red light businesses/Adult entertainment Red light businesses/Adult entertainment Prohibited Do not have this category of customer or industry  Prohibited Do not have this category of customer or industry  To u Travel and Tour Companies Do not have this category of customer or industry  To u Unregulated charities Do not have this category of customer or industry  Non thave this category of customer or industry  To u Urregulated charities Do not have this category of customer or industry  NBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited, others are outside of our scope or risk appetite (Do not have this category of customer or industry  If restricted, provide details of the restriction In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 b1	contain the elements as set out in the Wolfsberg	Yes
General Trading Companies	76 c	Embassies/Consulates	Do not have this category of customer or industry
Do not have this category of customer or industry	76 d	Extractive industries	Prohibited
Marijuana-related Entities	76 e	Gambling customers	Do not have this category of customer or industry
MSB/MVTS customers	76 f	General Trading Companies	Do not have this category of customer or industry
Non-account customers	76 g	Marijuana-related Entities	Prohibited
Non-Government Organisations   Do not have this category of customer or industry	76 h	MSB/MVTS customers	Prohibited
Non-resident customers  Do not have this category of customer or industry  Prohibited  Payment Service Providers  Do not have this category of customer or industry  Prohibited  PEPS  EDD on risk-based approach  PEP Close Associates  EDD on risk-based approach  PEP Related  EDD on risk-based approach  PeP Related  Precious metals and stones  Do not have this category of customer or industry  Red light businesses/Adult entertainment  Prohibited  Regulated charities  Do not have this category of customer or industry  For this category of customer or industry  Prohibited  Travel and Tour Companies  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  NEW Used Car Dealers  Do not have this category of customer or industry  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  If restricted, provide details of the restriction  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 i	Non-account customers	Prohibited
Nuclear power	76 j	Non-Government Organisations	Do not have this category of customer or industry
Payment Service Providers  Do not have this category of customer or industry  PEPS  EDD on risk-based approach  PEP Close Associates  EDD on risk-based approach  EDD on risk-based approach  PEP Related  EDD on risk-based approach  Percious metals and stones  Do not have this category of customer or industry  Red light businesses/Adult entertainment  Prohibited  Prohibited  Travel and Tour Companies  Do not have this category of customer or industry  Prohibited  Travel and Tour Companies  Do not have this category of customer or industry  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  NEG is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 k	Non-resident customers	Do not have this category of customer or industry
EDD on risk-based approach	76 I	Nuclear power	Prohibited
PEP Close Associates  EDD on risk-based approach PEP Related  EDD on risk-based approach Precious metals and stones Do not have this category of customer or industry Prohibited Regulated charities Do not have this category of customer or industry Prohibited  Regulated charities Do not have this category of customer or industry Prohibited  Travel and Tour Companies Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 m	Payment Service Providers	Do not have this category of customer or industry
PEP Related  EDD on risk-based approach  Precious metals and stones  Do not have this category of customer or industry  Red light businesses/Adult entertainment  Prohibited  Regulated charities  Do not have this category of customer or industry  For the shell banks  Prohibited  Travel and Tour Companies  Do not have this category of customer or industry  To work unregulated charities  Do not have this category of customer or industry  To work unregulated charities  Do not have this category of customer or industry  To work used Car Dealers  Do not have this category of customer or industry  To work unregulated charities  Do not have this category of customer or industry  To work unregulated charities  Do not have this category of customer or industry  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  If restricted, provide details of the restriction  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 n		EDD on risk-based approach
Precious metals and stones  Do not have this category of customer or industry  Red light businesses/Adult entertainment  Regulated charities  Do not have this category of customer or industry  Fot Shell banks  Prohibited  Travel and Tour Companies  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  If restricted, provide details of the restriction  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 o		EDD on risk-based approach
Red light businesses/Adult entertainment   Prohibited	76 p		
Regulated charities  Do not have this category of customer or industry  76 t  Shell banks  Prohibited  Travel and Tour Companies  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  To untual Asset Service Providers  Do not have this category of customer or industry  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 q		Do not have this category of customer or industry
Shell banks	76 r	<u> </u>	Prohibited
Travel and Tour Companies  Do not have this category of customer or industry  Unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Other (specify)  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  If restricted, provide details of the restriction  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 s		Do not have this category of customer or industry
To unregulated charities  Do not have this category of customer or industry  Do not have this category of customer or industry  To used Car Dealers  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 t		
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76 x Virtual Asset Service Providers Do not have this category of customer or industry  76 y Other (specify) NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  77 If restricted, provide details of the restriction In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 v	Ŭ	,
76 y  Other (specify)  NIBC is active in a very limited number of sectors. Some of the activities mentioned here above are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 w		
are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have this category of customer or industry).  If restricted, provide details of the restriction  In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.	76 x		Do not have this category of customer or industry
In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.  78 Does EDD require senior business management and/	76 y	Other (specify)	are on the exclusion list (Prohibited), others are outside of our scope or risk appetite (Do not have
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	77	If restricted, provide details of the restriction	In case of restricted on a risked based approach, potential deals are discussed on a case-by-case basis in NIBC's Engagement Committee.
	78		Yes

	T KYC P. A. L. C. L. H. L.	
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	Re. Q79 N.A. as NIBC does not offer current accounts and does not finance these type of entities.
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Intellimatch for Corporate Bank Business Forensics for Retail the Netherlands and Belgium GenoSONAR for Retail Germany
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9 PAVME	I NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
_	Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
02 -	,	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	PSD2
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	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?	SWIFT transaction screening for transactions Oracle Watchlist Screening for client data screening
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
104	What is the method used by the Entity?	Automated

105	Door the Entity have a data availty areas of	
105	Does the Entity have a data quality management programme to ensure that complete data for all	V
	transactions are subject to sanctions screening?	Yes
106	,	
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	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	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.	
11. TRAININ	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d 112 e	3rd Line of Defence Third parties to which specific FCC activities have	Yes
	been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes

	T 451 1 15 11 11 11 11 11 11 11 11 11 11 11	
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchies 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	
110	Compliance Testing process (separate from the	Yes
	independent Audit function)?	163
119	Confirm that all responses provided in the above	W.
	Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
120	If appropriate provide any additional	
120	If appropriate, provide any additional information/context to the answers in this section.	
	and the state of t	
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	Yes
	independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and	165
	practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent	
	third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
400 h	procedures	
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	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
123 K	Other (specify)	Yes
,		
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy	Yes
105	and completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
123 a	and the branch/es that this applies to.	
126	If any any alata and also any alata.	
	ııı appropriate, provide any additional	
	If appropriate, provide any additional information/context to the answers in this section.	
	information/context to the answers in this section.	
14. FRAU	information/context to the answers in this section.	
14. FRAU 127	information/context to the answers in this section.  Does the Entity have policies in place addressing	Yes
127	information/context to the answers in this section.  Does the Entity have policies in place addressing fraud risk?	Yes
	information/context to the answers in this section.  Does the Entity have policies in place addressing	Yes Yes

129	Does the Entity have real time monitoring to detect fraud?	No			
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?	No			
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	on 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)  NIBC Bank N.V. (Financial Institution name) is fully compliant to the fight against financial crime and makes					
NIBC Bank N.V. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.					
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.					
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.					
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.					
The Financial Institution commits to file accurate supplemental information on a timely basis.					
I, Bart Koch (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.					
I, Wendy van Beest (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.  — DocuSigned by:					
_Bart zou (Signature & Date)					
Wendy van Bust (Signature & Date)  D58BE6E7354749E					

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Wendy van Beest

wendy.van.beest@nibc.com

Group AML Officer

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Wendy van Beest

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# **Electronic Record and Signature Disclosure:**

Accepted: 06 November 2023 | 14:51 ID: 37e25e93-9101-4fbe-adf9-e97da6f4bc32 Company Name: NIBC Bank N.V.

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps

Envelope Summary Events	Status	Timestamps			
Envelope Sent	Hashed/Encrypted	06 November 2023   14:20			
Certified Delivered	Security Checked	06 November 2023   14:51			
Signing Complete	Security Checked	06 November 2023   14:52			
Completed	Security Checked	06 November 2023   14:52			
Payment Events	Status	Timestamps			
Electronic Record and Signature Disclosure					

#### **Disclosure Preview**

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If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

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#### **How to contact NIBC:**

You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically by contacting the NIBC employee that you have received the electronic document from.

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- The Privacy Statement for our Customers and Business Partners can be downloaded and read here: <a href="https://www.nibc.com/privacy-statement/">https://www.nibc.com/privacy-statement/</a>
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