## the Wolfsberg Group

Financial Institution Name:	The Commercial Bank (P.S.Q.C)
Location (Country) :	State of Qatar

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. ENTI	TY & OWNERSHIP	
1	Full Legal Name	The Commercial Bank (P.S.Q.C.)
2	Append a list of foreign branches which are covered by this questionnaire	Not Applicable
3	Full Legal (Registered) Address	Al Dafna Area (Commercial Bank Plaza), PO Box 3232, Doha, Qatar
4	Full Primary Business Address (if different from above)	Not Applicable
5	Date of Entity incorporation/ establishment	28 - December - 1974
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Qatar Stock Exchange Ticker Symbol: CBQK
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Not Applicable
7	% of the Entity's total shares composed of bearer shares	No Bearer Shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Not Applicable
9	Name of primary financial regulator / supervisory authority	Qatar Central Bank
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10	Provide Legal Entity Identifier (LEI) if available	2138004FUD4I7X8H721
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Not Applicable
12	Jurisdiction of licensing authority and regulator of ultimate parent	State of Qatar
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services / Custody	Yes
13 h	Broker / Dealer	Yes
13 i	Multilateral Development Bank	No
13 j	Other	Not Applicable
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	No
14 a	If Y, provide the top five countries where the non-resident customers are located.	Not Applicable
15	Select the closest value:	
15 a	Number of employees	501-1000
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
16 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

2. PRO	DUCTS & SERVICES	
17	Does the Entity offer the following products and	
17 a	services:  Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking	No
17 a3	services to domestic banks?  Does the Entity allow domestic bank clients to	No
17 a4	provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream	Yes
17 a5	relationships with domestic banks?  Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	Yes
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	Yes
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 ј	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	No
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	None
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
18 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
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3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient	
	experience/expertise	Yes
19 b	Cash Reporting	Yes
19 с	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	10-50
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Quarterly/Every three months
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23 a	If Y, provide further details	Not Applicable
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
24 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

4. AN	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	Yes
	programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	Yes
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	Yes
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
	This includes promising, offering, giving,	
	solicitation or receiving of anything of value,	Yes
	directly or indirectly, if improperly intended to	
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 с	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC	V
	policy or any other policy applicable to the Legal	Yes
	Entity)?	
31	Does the Entity have controls in place to	Yes
	monitor the effectiveness of their ABC	165
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	Yes
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	Yes
	ABC risk assessment?	103
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk	
	rating that is the net result of the controls	Yes
	effectiveness and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the	
	inherent risk components detailed below:	
	,	
35 a	Potential liability created by intermediaries and	
oo a	other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries	
<b>บ</b> อ ม	and industries in which the Entity does	Yes
	business, directly or through intermediaries	100
35 C	Transactions, products or services, including	
35 C	those that involve state-owned or state-	Yes
	controlled entities or public officials	1.50
35 d	Corruption risks associated with gifts and	
55 U	hospitality, hiring/internships, charitable	Yes
	donations and political contributions	100
35 e	Changes in business activities that may	
35 B	materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other	
30	independent third party cover ABC Policies and	Yes
	Procedures?	100

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
39 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

	, CTF & SANCTIONS POLICIES & PROCE	EDUKE9
40	Has the Entity documented policies and	
	procedures consistent with applicable AML,	
	CTF & Sanctions regulations and requirements	
	to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40.1-	Township for an aire	
40 b	Terrorist financing	Yes
40 c	Sanctions violations	
40 C	Sanctions violations	Yes
41	Are the Entity's policies and procedures	
71	updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped	
72	against/compared to:	
42 a	US Standards	
u	oo samaa a	Yes
42 a1	If Y, does the Entity retain a record of the	
	results?	Yes
42 b	EU Standards	
		Yes
42 b1	If Y, does the Entity retain a record of the	Van
L	results?	Yes
43	Does the Entity have policies and procedures	
	that:	
43 a	Prohibit the opening and keeping of	Yes
	anonymous and fictitious named accounts	100
43 b	Prohibit the opening and keeping of accounts	Yes
	for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide	Yes
	banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides	Yes
	services to shell banks	
43 f	Prohibit opening and keeping of accounts for	Yes
42	Section 311 designated entities  Prohibit opening and keeping of accounts for	
43 g	any of unlicensed/unregulated remittance	
	agents, exchanges houses, casa de cambio,	Yes
	bureaux de change or money transfer agents	
43 h	Assess the risks of relationships with domestic	
	and foreign PEPs, including their family and	Yes
	close associates	
43 i	Define escalation processes for financial crime	V
	risk issues	Yes
43 j	Define the process, where appropriate, for	
	terminating existing customer relationships due	Yes
	to financial crime risk	
43 k	Specify how potentially suspicious activity	
1	identified by employees is to be escalated and	Yes
	investigated	
43 I	Outline the processes regarding screening for	Yes
40	sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of	Yes
44	internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a	No.
	risk boundary around their business?	Yes
45	Does the Entity have a record retention	
1 40	procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	
TU a	, what is the following period:	5 years or more
46	Confirm that all responses provided in the	
l	above Section POLICIES & PROCEDURES	Yes
	are representative of all the LE's branches	
46 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
		Not Applicable
46 b	If appropriate, provide any additional	
	information / context to the answers in this	
	section.	Not Applicable
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47	Does the Entity's AML & CTF EWRA cover the	
**	inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	Not Applicable
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 с	Channel	Yes
50 d	Geography	Yes

Dans the Entitude Countings EWDA sevenths	
controls effectiveness components detailed below:	
Customer Due Diligence	Yes
Transaction Screening	Yes
Name Screening	Yes
List Management	Yes
Training and Education	Yes
Governance	Yes
Management Information	Yes
Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
If N, provide the date when the last Sanctions EWRA was completed.	Not Applicable
Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
	below:  Customer Due Diligence  Transaction Screening  Name Screening  List Management  Training and Education  Governance  Management Information  Has the Entity's Sanctions EWRA been completed in the last 12 months?  If N, provide the date when the last Sanctions EWRA was completed.  Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this

7. KYC	, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	POAs, Senior Management, Corporate Shareholders etc,
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	Channels, PEP status, Age of business, Lenghth of relationship, etc.
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

70	From the list below, which categories of	
	customers or industries are subject to EDD and/or are restricted, or prohibited by the	
	Entity's FCC programme?	
70 a	Non-account customers	Prohibited
	Non-resident control	Profibiled
70 b	Non-resident customers	EDD & restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD & restricted on a risk based approach
70 e	PEPs	EDD & restricted on a risk based approach
70 f	PEP Related	EDD & restricted on a risk based approach
70 g	PEP Close Associate	EDD & restricted on a risk based approach
70 h	Correspondent Banks	EDD & restricted on a risk based approach
70 h1	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD & restricted on a risk based approach
70 j	Atomic power	Prohibited
70 k	Extractive industries	EDD & restricted on a risk based approach
70 I	Precious metals and stones	EDD & restricted on a risk based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	EDD & restricted on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD & restricted on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD & restricted on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	EDD & restricted on a risk based approach
70 v	Other (specify)	
		Private Banking / Ultra High Net worth customers are also classified as High Risk and subject to EDD.
71	If restricted, provide details of the restriction	The bank conducts EDD measures in order to adequately mitigate the risk associated with high risk customers. This includes an update of customer information and periodic reviews of account activities. If periodic review of EDD is not completed on time, then measures are applied by restricting account activities.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the	
_	above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not Applicable
73 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

74	Does the Entity have risk based policies,	I
74	procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	Trade Finance and Exchange House Activities
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not Applicable
79 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance	
FATF Recommendation 16	Yes
Local Regulations	Yes
Specify the regulation	Anti-Money Laundering and Combating Terrorism Financing Instructions for Financial Institutions (May 2020)
If N, explain	Not Applicable
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
If appropriate, provide any additional information / context to the answers in this section.	Not Applicable
	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance  FATF Recommendation 16  Local Regulations  Specify the regulation  If N, explain  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?  Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?  Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.

Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with or through accounts held at foreign financial institutions?  7 Dees 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 local services and control prohibit and/or detect actions taken to evade applicable to the entity's local unstitutions prohibitions applicable to the other entity's local fursited to the 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?  89 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  90 What is the method used by the Entity?  10 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  91 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  92 What is the method used by the Entity?  93 Select the Sanctions Lists used by the Entity in its sanctions screening processes:  93 Consolidated United Nations Security Council Sanctions List (LIN)  93 United States Department of the Treasury's Office of Fioreign Assets Control (OFAC)  93 Conflict of Fioreign Assets Control (OFAC)  94 United States Department of the Treasury's Office of Fioreign Assets Control (OFAC)  95 Conflict of Fioreign Assets Control (OFAC)  96 United States Department of the Treasury's Office of Fioreign Assets Control (OFAC)  97 United States Department of the Treasury's Office of Fioreign Ass	10. SA	D. SANCTIONS		
approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, of through accounts held at foreign financial residuous?  77 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity accounts or services sanctions prohibitions applicable to the other entity (including prohibitions within the other entity froulding prohibitions within the other entity froulding prohibitions within the other entity froulding prohibitions, such as stripping, or the result information in cross border controls reasonably designed to prohibit and/or detect actions taken, or sanctions prohibitions, such as stripping, or the resultinasion and/or masking, of sanctions relevant information in cross border transactions and/or masking, of sanctions relevant information in cross border transactions against Sanctions Lists?  90 What is the method used by the Entity?  10 Does the Entity screen all sanctions relevant data, including at animinum, entity and location information, contained in cross border transactions against Sanctions Lists?  12 What is the method used by the Entity?  13 Select the Sanctions Lists used by the Entity in its sanctions screening processes:  15 Select the Sanctions Lists used by the Entity in its sanctions screening processes:  15 Consolidated United Nations Security Council Sanctions List (UN)  15 United States Department of the Treasury's Office of Foreign Assets Control (OFAC)  16 Confident United States Department of the Treasury's Office of Foreign Assets Control (OFAC)  17 Cherry (specify)  18 What is the method used by the Entity in its sanctions screening processes:  18 Consolidated United Nations Implementation United Sanctions List (UN)  19 United States Department of the Treasury's Office of Foreign Assets Control (OFAC)  18 Control of Foreign Assets Control (OFAC)  29 Control of Foreign Assets Control (OFAC)  20 Control of Foreign Assets Control (OFAC)  20 Control of F				
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## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
97 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 с	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
102 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable

12. QL	2. QUALITY ASSURANCE /COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable	
105 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable	

13. AU	3. AUDIT		
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:		
107 a	Internal Audit Department	Yearly	
107 b	External Third Party	Yearly	
108	Does the internal audit function or other independent third party cover the following areas:		
108 a	AML, CTF & Sanctions policy and procedures	Yes	
108 b	KYC / CDD / EDD and underlying methodologies	Yes	
108 c	Transaction Monitoring	Yes	
108 d	Transaction Screening including for sanctions	Yes	
108 e	Name Screening & List Management	Yes	
108 f	Training & Education	Yes	
108 g	Technology	Yes	
108 h	Governance	Yes	
108 i	Reporting/Metrics & Management Information	Yes	
108 j	Suspicious Activity Filing	Yes	
108 k	Enterprise Wide Risk Assessment	Yes	
108 I	Other (specify)	Risk Grading System (RGS) for customer risk rating	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable	
110 b	If appropriate, provide any additional information / context to the answers in this section.	Not Applicable	

## Declaration Statement

Type text here

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

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)

The Commercial Bank (P.S.Q.C.)

tion name) is fully committed to the fight against financial crime and makes

every energial committee computation 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 egal 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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.

Mansoor A A Salem

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.

**Dmitry Artemiev** 

alent), 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.

Marsoor Salem 28/11/2022

Dmitry Artemiev 28/11/2022 (e)