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

the Wolfsberg Group

Financial Institution Name: Location (Country):

CREDIT AGRICOLE EGYPT S.A.E. EGYPT

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	CREDIT AGRICOLE EGYPT S.A.E
2	Append a list of foreign branches which are covered by this questionnaire	http://eip-egypt.eab.bank.local/oweb/BR_ATM/BR_ATM.html
3	Full Legal (Registered) Address	Ring Road exit to 90th Street, 1st right to Choueifat Area (Next to Safwa Compound) - 5th Settlement - New Cairo - 11835 - Egypt
4	Full Primary Business Address (if different from above)	Same as above
5	Date of Entity incorporation/establishment	10 February 1977
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a 1	If Y, indicate the exchange traded on and ticker symbol	Stock Exhange: Egyptian Stock Exchange Symbol: CIEB
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	Credit Agricole SA - France: 52,185%/ Credit Agricole CIB- France: 13,066%/ Rolaco E.G.P Investments Owned by Ali Hassan Ali Ben Dayekh UAE (One person company LLC): 9,967% - Free float: 24,78% where no other shareholder holds more than 5%
7	% of the Entity's total shares composed of bearer shares	0
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No V
10	Name of primary financial regulator/supervisory authority	Central Bank of Egypt "CBE"
11	Provide Legal Entity Identifier (LEI) if available	549300EP6V6LBXH4SE65
12	Provide the full legal name of the ullimate parent (if different from the Entity completing the DDQ)	Credit Agricole S.A France

13	Jurisdiction of licensing authority and regulator of	France - Banque de France
	ultimate parent	France - Banque de France
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14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes S
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No S
141	Multilateral Development Bank	No E
14]	Wealth Management	Yes
14 k	Other (please explain)	
1	The state of the s	
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i		
15	Does the Entity have a significant (10% or more)	
1.3	portfolio of non-resident customers or does it derive	
ļ	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No T
i	resident in a different jurisdiction to the location	
i	where bank services are provided)	
45 -	12 V	1
15 a	If Y, provide the top five countries where the non- resident customers are located.	
i	resident customers are located.	
i		
<u> </u>		
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Yes
<u> </u>	Section are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to	
i	and the branch/es that this applies to.	
i		
i		
18	If appropriate, provide any additional	CAE Beneficial Owners: Credit Agricole S.AFrance Owners: SAS Rue La Boetie SA-France
i	information/context to the answers in this section.	56.8%- Institutional Investos:29.6%-Individula shareholders:7% Emplyees:6% Treasury Shares:
i		0.6%, where no shareholder other than SAS owns 5% or more of the share capital- SAS Rue La Boetie is wholly-owned by: Credit Agricole Regional Banks
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2 PRODU	CTS & SERVICES	3.33.33.33.33.33.33.33.33.33.33.33.33.3
	CTS & SERVICES Does the Entity offer the following products and	
2. PRODU	CTS & SERVICES Does the Entity offer the following products and services:	
19	Does the Entity offer the following products and services:	
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y	
19 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	YesYes
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures	Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	YesYes
19 a 19 a 1 19 a 1 a 1 19 a 1 a 1 b 1 9 a 1 c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a 19 a 1 19 a 1 a 1 19 a 1 a 1 b 1 9 a 1 c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes
19 a 1 9 a 1 a 1 9 a 1 a 1 b 1 9 a 1 c 1 9 a 1 d 1 9 a 1 d 1 9 a 1 e	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes
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19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes Table 1 Table 2 Ta
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19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 d 19 a 1 f 19 a 1 f 19 a 1 g	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes Yes No Yes Yes Yes Yes Yes No Yes
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19 a 19 a 1 19 a 1 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 f 19 a 1 g 19 a 1 h 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MYTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes No Yes Yes Yes No Yes No No In In In In In In In In In I
19 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 d 19 a 1 d 19 a 1 f 19 a 1 f 19 a 1 h 1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes No Yes Yes No No No No No No No No No N

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	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No	~
19 b	Cross-Border Bulk Cash Delivery	No	
19 c	Cross-Border Remittances	Yes	
19 d	Domestic Bulk Cash Delivery	No	
19 e	Hold Mail	Yes	
19 f	International Cash Letter	No	
19 g	Low Price Securities	No	
19 h	Payable Through Accounts	No	
19 i	Payment services to non-bank entities who may		=
	then offer third party payment services to their customers?	No	•
19 1	If Y, please select all that apply below?		100
19 i2	Third Party Payment Service Providers	No	ether of
19 i3	Virtual Asset Service Providers (VASPs)	No	*******
19 4	eCommerce Platforms	No	
19 i5	Other - Please explain		
19 j	Private Banking	Both	أستسا
19 k	Remote Deposit Capture (RDC)	No	
19 I	Sponsoring Private ATMs	No	
19 m	Stored Value Instruments	No	
19 п	Trade Finance	Yes	
19 o	Virtual Assets	No	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:		
19 p1	Check cashing service	No	Acres 1
19 p1a	If yes, state the applicable level of due diligence	No due diligence (Not required)	فسسا
19 p2	Wire transfers	No	
19 p2a	If yes, state the applicable level of due diligence	No due diligence (Not required)	المسدا
19 p3	Foreign currency conversion	Yes	
19 p3a	If yes, state the applicable level of due diligence	Due diligence	cons.
19 p4	Sale of Monetary Instruments	No	aver//
19 p4a	If yes, state the applicable level of due diligence	No due diligence (Not required)	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	The walk in customers' transactions are limited to buying or selling FCY with limited amounts a with simplified KYC for some segments and applicable for due diligence.	ınd
		N/A	
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A, as we do not deal with the MSBs therefore we do not have policy or process.	
19 q 20		Yes	-
	the Entity (please specify) Confirm that all responses provided in the above		_
20	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference's relate to		
20 a	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes	
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20 20 a 21 3. AML, C 22 22 a	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes As per question 19a CAE offers correspondent banking in EGP.	
20 a 21 3. AML., C 22	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes As per question 19a CAE offers correspondent banking in EGP.	
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20 a 21 3. AML, C 22 22 a 22 b 22 c	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section, TF & 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 As per question 19a CAE offers correspondent banking in EGP, Yes Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & 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	Yes As per question 19a CAE offers correspondent banking in EGP. Yes Yes Yes Yes Yes	
20 a 21 3. AML, C 22 22 b 22 c 22 d 22 e	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF. & 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 As per question 19a CAE offers correspondent banking in EGP, Yes Yes Yes Yes Not applicable Yes	
20 a 21 3. AML, C 22 2 2 2 2 2 2 2 2 2 5	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & 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 As per question 19a CAE offers correspondent banking in EGP. Yes Yes Yes Yes Not applicable	
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20 20 a 21 21 3. AML, C 22 22 b 22 c 22 d 22 c 22 d 22 c 22 f 22 g 22 h	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. IF & 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 Independent Testing Periodic Review	Yes As per question 19a CAE offers correspondent banking in EGP. Yes Yes Yes Yes Not applicable Yes Yes Yes Yes Yes Yes Yes Yes	
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Training and Education Ves	22 m	Suspicious Activity Reporting	Yes	1
Yes				
AMIL CTF & Sanctions Compliance Department? A Is the Entity AMIL CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committed Fit Mecketch your part of the Senior 20. The Senior 20. Does the Board receive, assess, and challenge and the Senior Senior Management Committed Fit Mecketch your part of the Senior 20. Does the Entity senior Seni	22 0	Transaction Monitoring	Yes	
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and the branch/es that this applies to. 29 If appropriate, provide any additional information/context to the answers in this section. 4. ANTI BRIBERY & CORRUPTION 30 I has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 31 Ones the Entity have an enterprise wide programme that sets minimum ABC standards? 32 Has the Entity appointed a designated officer or officers with sufficient experience/sperfise in experience/sperfise to implement the ABC programme? 33 Oses the Entity have adequate staff with appropriate levels of experience/experfise to implement the ABC programme? 34 Is the Entity's ABC programme applicable to. 35 Dest the Entity have a global ABC policy that: 35 Includes a prohibition against the fallsification of books and records (peting, single, solicitation or receiving of anything of value, directly or indirectly, if improperty intended to influence action or obtain an advantage. 35 b Includes a prohibition against the fallsification of books and records (this may be within the ABC programme? 36 Oses the Entity have controls in place to monitor the effectiveness of their ABC programme? 37 Oses the Board receive, assess, and challenge regular reporting on the status of the ABC programme? 38 In as the Entity's ABC Enterprise Wifee Rick Assessment? 40 Oses the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity have be CEMPA over the inherent risk components detailed below: 40 Does the Entity have the fall programme? 41 Includes a prohibition of the controls effectiveness and the inherent risk assessment?	28		Yes	~
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components detailed below: 40 a Potential liability created by intermediaries and	39	is the net result of the controls effectiveness and the inherent risk assessment?	Yes	¥
1/	40		Yes	₹
	40 a		Yes	₹

40 b			
	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	-
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	•
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	•
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	V
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	¥
42	Does the Entity provide mandatory ABC training to:		90.7
42 a	Board and senior Committee Management	Please select	
42 b	1st Line of Defence	Yes	L
42 c	2nd Line of Defence	Yes	
42 d	3rd Line of Defence	Yes	1
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	~
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	T
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	¥
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.		
5 AMI C	TF & SANCTIONS POLICIES & PROCEDURES		
46	Has the Entity documented policies and procedures		T(185811)
	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	Terrorist financing Sanctions violations	Yes Yes	
	Terrorist financing		
46 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes	
46 c 47	Terrorist financing Sanctions violations 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	Yes	
46 c 47 48 48 a 48 a	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results?	Yes No Yes Not Applicable	
46 c 47 48 48 a	Terrorist financing Sanctions violations 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	Yes No Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes No Yes Not Applicable	
46 c 47 48 48 a 48 a 48 a1 48 b 48 b1	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annuality? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes No Yes Not Applicable Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes No Yes Not Applicable Yes Not Applicable	
46 c 47 48 48 a 48 a1 48 b1 48 b1 49 a	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: 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	Yes No Yes Not Applicable Yes Not Applicable Yes	
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: 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	Yes No Yes Not Applicable Yes Not Applicable Yes Ves Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 b 49 c 49 d	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: 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 accounts/relationships with shell banks	Yes No Yes Not Applicable Yes Not Applicable Yes Ves Not Applicable Yes	
46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c 49 d 49 e	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: 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 accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	Yes No Yes Not Applicable Yes Not Applicable Yes Ves Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a1 48 b 48 b1 49 a 49 c 49 d 49 e	Terrorist financing Sanctions violations 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 If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts 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	Yes No Yes Not Applicable Yes Not Applicable Yes Yes Yes Yes	
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sanctions, PEPs and Adverser Media/Negative News 1	49 I	handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes	-
Internal *varichitiss* Has be Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? Does the Entity have record reference procedures that compy with applicable twar? If y, what is the retention period? If y, what is the retention period? Confirm that all responses provided in the above section are representative of all the LES branches Confirm that all responses provided in the above section are representative of all the LES branches If Against which guestions the difference's relate to and the branch'ses that this applies to. If appropriate, provide any additional information formation that the answers in this section. If appropriate, provide any additional information formation that the answers in this section. G.AML, CTF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Yes Considered that I was a section of the control of the control effectiveness components detailed below: Yes Through the control effectiveness components detailed below: Yes Transaction Monitoring Yes Transaction Monitoring Yes Transaction Monitoring to the additional information to the control effectiveness components detailed below: Yes Transaction Monitoring to the control of the control of the control effectiveness components detailed below: Yes Transaction formation Yes Transaction Monitoring to the control of the components of the control effectiveness components detailed below: Yes Transaction formation Yes Transact	49 m		Yes	—
similar document which defines a risk boundary around their business? 51 a Dees the Entity have record retention procedures that comply with applicable laws? 51 a If Y, what is the retention period? 52 a Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a If N, darky which guestions the difference's relate to and the branch'ses that this applies to. 53 a If appropriate, provide any additional information formation in the machines that this applies to. 54 a Client 55 a Client 56 a Transaction Mominoring 57 To Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 58 b Perioduct 59 a Client 50 A Segregably 51 A Segregable 52 B Transaction Mominoring 53 A Transaction Mominoring 54 A Segregably 55 A Transaction Mominoring 56 A Man Segregable 57 C Does the Entity's SALL & CTF EWRA been completed in the list of the Controls of the Control Segregable 58 A Segregable 59 A Segregable 50 A Segregable 50 A Segregable 50 A Segregable 50 A Segregable 51 A Segregable 52 A Segregable 53 A Segregable 54 A Segregable 55 A Segregable 56 A Transaction Mominoring 57 A Does the Entity's SALL & CTF EWRA been completed in the list of the Controls of the Secretary Segregable 57 A Segregable 58 A Segregable 59 A Segregable 50 A Segregable 50 A Segregable 50 A Segregable 51 A Segregable 52 A Segregable 53 A Segregable 54 A Segregable 55 A Segregable 55 A Segregable 56 A Segregable 57 A Segregable 58 A Segregable 59 A Segregable 59 A Segregable 50 A Segregable 51 A Segregable 52 A Segregable 53 A Segregable 54 A Segregable 55 A Segregable 56 A Segregable 57	49 n		Yes	~
comply with applicable lawe? If Y, what is the retention period? Syears or more Syears or more 152	50	similar document which defines a risk boundary	Yes	·
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18 N. clarify which questions the difference/s relate to and the branch/es that this applies to. 18 appropriate, provide any additional information/context to the answers in this section. 19 AML, CTF & SANCTIONS RISK ASSESSMENT 19 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 19 AML & CTF EWRA cover the controls effectiveness components detailed below: 19 AML & CTF EWRA cover the controls of the focal regulations. 20 AML & CTF EWRA cover the controls effectiveness components detailed below: 21 AML & CTF EWRA cover the controls effectiveness components detailed below: 22 AML & CTF EWRA cover the controls effectiveness components detailed below: 23 AML & CTF EWRA cover the controls effectiveness components detailed below: 24 AML & CTF EWRA cover the controls effectiveness components detailed below: 25 AU Channel Yes 26 Channel Yes 27 AML & CTF EWRA cover the controls effectiveness components detailed below: 28 AML & CTF EWRA cover the controls effectiveness components detailed below: 25 AML & CTF EWRA cover the controls effectiveness components detailed below: 26 AML & CTF EWRA been completed in the last AML & CTF EWRA been completed in the last Park and the last AML & CTF EWRA cover the inherent risk components detailed below: 26 AML & CTF EWRA been completed in the last AML & CTF EWRA cover the inherent risk components detailed below: 27 AML & CTF EWRA cover the inherent risk components detailed below: 28 AML & CTF EWRA cover the inherent risk components detailed below: 29 AML & CTF EWRA cover the controls effectiveness components detailed below: 29 AML & CTF EWRA cover the controls effectiveness components detailed below: 20 AML & CTF EWRA cover the controls effectiveness components detailed below: 30 AML & CTF EWRA cover the controls effectiveness components detailed below: 31 AML & CTF EWRA cover the controls effectiveness components detailed below: 32 AML & CTF EWRA cover the controls effectiveness components detailed below: 33 AML & CTF EWRA c	52		Yes	-
Information/context to the answers in this section. Oucestons 4 48a1 8 48b1: Marked as not applicable: considering 48a 8 48 bare marked yet; CAE policies and procedures are set within Group norms gapping US and EU standards in addition to the local regulations. 6. AML, CTF & SANCTIONS RISK ASSESSMENT 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: 54 a Client 74 Yes 55 Coverance 75 Coverance 76 PPP Identification 76 Yes 77 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 78 Age and the set of	52 a	If N, clarify which questions the difference/s relate to		num
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54 b Product Yes		Does the Entity's AML & CTF EWRA cover the		
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 Transaction Monitoring Yes 55 b Customer Due Diligence Yes 55 c PEP Identification Yes 55 d Transaction Screening Yes 55 e Name Screening Against Adverse Media/Negative News Yes 55 f Training and Education Yes 55 g Governance Yes 55 g Governance Yes 56 a If N, provide the date when the last AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed. 57 a Client Yes 57 c Channel Yes 58 d Geography Yes 59 Governance Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 a Customer Due Diligence Yes 58 a Customer Due Diligence Yes 58 c List Management Yes 58 C List Management Yes 59 Governance Yes 59 Governance Yes 50 Exit Standard Yes 50 Exit Standard Yes 51 Does the Entity's Sanctions EWRA cover the controls of effectiveness components detailed below: 59 Governance Yes 50 C List Management Yes 50 List Management Yes 50 C List Management Yes 51 Does the Entity's Sanctions EWRA cover the controls 52 C List Management Yes 53 C List Management Yes 54 C List Management Yes 55 C List Management Yes 56 C List Management Yes 57 C List Management Yes 58 Does The Entity's Sanctions EWRA Cover The Controls 59 C List Management Yes 59 C List Management Yes 50 C List Management Management Yes 50 C List Management Montron Yes 50 C List Management Montron Yes 50 C L	54 a	Client	Yes	أعبسا
54 d Geography Yes Does the Entity's AML & CTF EWRA cover the controls of Rectiveness components detailed below: 55 a Transaction Monitoring Yes	54 b	Product	Yes	3
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Transaction Screening Transaction Screening against Adverse Media/Negative News Name Screening against Adverse Media/Negative News Training and Education Yes So Governance Yes Training and Education Yes So Has the Entity's AML & CTF EWRA been completed in the last 12 months? To loes the Entity's Sanctions EWRA cover the inherent risk components detailed below: To Channel To Channel To Channel To Channel To Channel To Channel To Coegraphy Yes To C		_ L		
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	56 a 57 57 a 57 b 57 c 57 d 58 58 a 58 b 58 c	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 List Management	Yes	

(F.)	N 0i	lea '	
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	V
50 -			3
.59 a	If N, provide the date when the last Sanctions EWRA was completed.		
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	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 C	DD and EDD		
62	Does the Entity verify the identity of the customer?	Yes	1
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	3
64 d	Ownership structure	Yes	I
64 e			
	Product usage	Yes	
64 f	Purpose and nature of relationship		Y
64 g	Source of funds	Yes	
64 h	Source of wealth	Yes	
65	Are each of the following identified:		1. 1
65 a	Ultimate beneficial ownership	Yes	
65 a1	Are ultimate beneficial owners verified?	Yes	X1
65 b	Authorised signatories (where applicable)	Yes	T
65 c	Key controllers	Yes	
65 d	Other relevant parties	Yes	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%	v
67	Does the due diligence process result in customers receiving a risk classification?	Yes	V
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	a.e.
67 a4	Legal Entity type	Yes	Laura
67 a5	Adverse Information	Yes	.
67 a6	Other (specify)		
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No	V
68 a	If Y, is this at:		
68 a1	Onboarding	Please select	
68 a2	KYC renewal	Please select	
68 a3	Trigger event	Please select	
68 a4	Other	Please select	
68 a4a	If yes, please specify "Other"		
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	لنستسا
69 a2	KYC renewal	Yes	

69 a3	Trigger event	Yes	Y
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual	¥
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?		•
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	¥.
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	V
74 a	If yes, select all that apply:		
74 a1	Less than one year	Piease select	
74 a2	1 – 2 years	Please select	
74 a3	3 – 4 years	Please select	
74 a4	5 years or more	Please select	
74 a5	Trigger-based or perpetual monitoring reviews	Please select	
74 a6	Other (Please specify)	KYC renewed at defined frequencies based on risk rating or in case of client's data changes. For the frequency of risk rating: 1- Very high risk annually. 2- High risk every 2 years. 3- Medium risk every 3 years. 4- Low risk every 5 years.	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	•
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	~	
76 a	Arms, defence, military	EDD on risk-based approach	Ţ
76 b	Respondent Banks	EDD on risk-based approach	Ż.
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	•
76 c	Embassies/Consulates	EDD on risk-based approach	▼.
76 d	Extractive industries	EDD on risk-based approach	Y
76 e	Gambling customers		¥
76 f	General Trading Companies		Y
76 g	Marijuana-related Entities	Prohibited Prohibited	X
76 h	MSB/MVTS customers		<u> </u>
76 i	Non-account customers	Prohibited	¥
76 j	Non-Government Organisations	· · · · · · · · · · · · · · · · · ·	Σ.
76 k	Non-resident customers	EDD on risk-based approach	
761	Nuclear power	Prohibited	X
76 m	Payment Service Providers	Prohibited	¥
76 n	PEPs	EDD on risk-based approach	
76 o	PEP Close Associates		X
76 p	PEP Related		Ŧ
76 g	Precious metals and stones	4	Y
76 r	Red light businesses/Adult entertainment		Ţ
76 s	Regulated charities	1	Y
76 t	Shell banks		T.
76 u	Travel and Tour Companies		V
	·		X
76 v	Unregulated charities		_
76 w	Used Car Dealers	EDD on risk-based approach	Y
76 x 76 y	Virtual Asset Service Providers Other (specify)	Prohibited	7
77	If restricted, provide details of the restriction		
78	Does EDD require senior business management and/ or compliance approval?	Yes	*

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	Yes	•
	lawyers, accountants, consultants, real estate agents?		
80	Does the Entity perform an additional control or	Yes	
	quality review on clients subject to EDD?		
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
06 -	<u> </u>	<u></u>	nou
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.	Question#78a: Obtaining senior managment approval for establishing/updating business relationships for PEP.	
REMONIT	ORING & REPORTING		840
			8000
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?	Aulomated	,
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?	Internal System]
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	·	
84 b2	When was the tool last updated?	< 1 year	1
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	7
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.		_
Q DAVE	ENT TRANSPARENCY		-
9. PATWII	Does the Entity adhere to the Wolfsberg Group		=======================================
	Payment Transparency Standards?	Yes	•
	1 ,	l lea	460

93	Does the Entity have policies, procedures and processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	CBE and FIU regulations
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	_
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at for	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?	FIRCOSOFT and FACTIVA
102 a2	When did you last lest 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)	1-2 years
103	data) of the matching configuration of the automated tool? (If 'Other' please explain in	1-2 years Yes

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	v
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	•
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	~
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Not used	¥
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
106 e	Lists maintained by other G7 member countries	Not used	
106 f	Other (specify)	Egypt local list. The official journal of the European Union, The official journal of the French Republic. OFAC. US Department of state.	
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	3
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.	Question # 102 a2 the configuration and testing of the automated tools take place on the group level in Credit Agricol SA in Paris. Questions # 106 c and # 106 e sanctions lists maintained by Office of Financial Sanctions Implementation HMT (OFSI) and other G7 member countries are not used for screening proce	
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	v
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	¥
111 e	Conduct and Culture	Yes	-manif
111 f	Fraud	Yes	
112	Is the above mandatory training provided to:		-
112 a	Board and Senior Committee Management	Yes	3
112 b	1st Line of Defence	Yes	
112 c 112 d	2nd Line of Defence	Yes	.¥.
112 a	3rd Line of Defence Third parties to which specific FCC activities have	Yes	
	been outsourced	Not Applicable	_
112 f	Non-employed workers (contractors/consultants)	Not applicable	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	¥
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	7
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	₹

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115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
	The second secon		
	,		
116	If appropriate, provide any additional	***************************************	
	information/context to the answers in this section.		
12. QUALITY	ASSURANCE /COMPLIANCE TESTING	T TO THE STATE OF	158.4
1111	Does the Entity have a program wide risk based Quality Assurance programme for financial crime	Yes	
ļ	(separate from the independent Audit function)?	163	
118	Does the Entity have a program wide risk based	nan-rusunikannikanni suk	
	Compliance Testing process (separate from the	Yes	-
	independent Audit function)?		
119	Confirm that all responses provided in the above	Yes	U
440 -	Section are representative of all the LE's branches		
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
	and the branchies that the applies to.		
120	If appropriate, provide any additional		
	information/context to the answers in this section.		
13. AUDIT			150
121	In addition to inspections by the government		П
	supervisors/regulators, does the Entity have an		
	internal audit function, a testing function or other independent third party, or both, that assesses FCC	Yes	↓
	AML, CTF, ABC, Fraud and Sanctions policies and		
	practices on a regular basis?		
122	How often is the Entity audited on its AML, CTF, ABC,		
	Fraud and Sanctions programme by the following:		
122 a	Internal Audit Department	Yearly	Z
122 b	External Third Party	Component-based reviews	1
123	Does the internal audit function or other independent		
	third party cover the following areas:		
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes	▼
123 b	Enterprise Wide Risk Assessment	Yes	<u> </u>
123 c	Governance	Yes	
123 d	KYC/CDD/EDD and underlying methodologies	Yes	I4
123 e	Name Screening & List Management	Yes	
123 f	Reporting/Metrics & Management Information	Yes	
123 g	Suspicious Activity Filing		1
123 h	Technology	Yes	
123 i	Transaction Monitoring		X
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes	Z
123 [Other (specify)	Yes	
1201	Outer (Specify)		
124	Are adverse findings from internal & external audit		
	tracked to completion and assessed for adequacy	Yes	-
	and completeness?		
125	Confirm that all responses provided in the above	Yes	Ţ
405 -	section are representative of all the LE's branches		
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
	and the Mandines that this applies to.		
126	If appropriate, provide any additional		
120	information/context to the answers in this section.		
	[
14. FRAUE			9835V
127	Does the Entity have policies in place addressing		
	fraud risk?	Yes	*
128	Does the Entity have a dedicated team responsible	Yes	T
	for preventing & detecting fraud?	1	1

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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) CREDIT AGRICOLE EGYPT S.A.E. (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 MOHAMED WAGDI 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.		
, AMR FATHY HASSAN (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.		
	(Signature & Dat	te)
Am (atta 13/02/2024 (Signature & Date)		