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

the Wolfsberg Group

Financial institution Name: Location (Country) : ProCredit Bank S.A. Romania

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 parapective of the LE and on behalf of all of its branches 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.

1. ENTITY	Y & OWNERSHIP	
1	Full Legal Name	
		ProCredit Bank S.A.
2	Append a list of foreign branches which are covered by	
4		
	this questionnaire	n/a
3	Full Legal (Registered) Address	
		62-64 Buzesti Street, 1st, 2nd, and 4th floors, 1st District Bucharest, Romania
4	Full Primary Business Address (if different from above)	
-	Tak I what y business Address (if different from above)	
		n/a
5	Date of Entity incorporation/establishment	
		May 6th 2003
		May 9th, 2002
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
V 41	symbol	
	Syriuo	
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	PROCREDIT HOLDING AG ("PCH") - 99.999606% of the share capital. More information on ownership structu
		of PCH can be found at: https://www.procreditbank.ro/ https://www.procredit-holding.com/
7	% of the Entity's total shares composed of bearer shares	
	to the many a total original de abiliposos or sociol original	
		n/a
_	D 1	
8	Does the Entity, or any of its branches, operate under an	No
0.	Offshore Banking License (OBL)?	
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	no
	services only through online channels?	III .
10	Name of primary financial regulator/supervisory authority	
		The Matienal Bank of Demonia
		The National Bank of Romania
11	Provide Legal Entity Identifier (LEI) if available	
		5299006OMGUYDLEXQ337
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	ADDOCREDIT HOLDING AC
		PROCREDIT HOLDING AG
13	Jurisdiction of licensing authority and regulator of ultimate	
1.5	parent	Federal Republic of Germany
	Paron.	Federal Financial Supervisory Authority and Deutsche Bundesbank
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
CONTRACTOR OF THE PARTY OF THE	Commercial Banking	Yes
14 c		
14 c 14 d	Transactional Banking	Yes
14 c 14 d 14 e		Yes No No

14 g	Securities Services/Custody	No
14 h		No
14 i		No No
14 j		No
14 k	Other (please explain)	
		For further information, please visit: https://www.procreditbank.ro/en/about-us/mission
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided).	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	n/a
2 PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	HY	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No -
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No.
		No

19 a1i		
	Does the Entity have processes and procedures in	No.
	place to identify downstream relationships with	No
40.1	MSBs /MVTSs/PSPs? Cross-Border Bulk Cash Delivery	No
19 b	Cross-Border Bulk Cash Delivery Cross-Border Remittances	No No
19 c 19 d	Domestic Bulk Cash Delivery	No No
19 e	Hold Mail	No
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?	Yes
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
		n/a
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No .
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No No
19 n		Yes
19 o	Virtual Assets	No
19 р	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		No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3		No .
19 p3a	If yes, state the applicable level of due diligence	
19 p4		No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	n/a
40	Other bish dali was firete and an about the stiffed by the	
19 q	Other high-risk products and services identified by the Entity (please specify)	n/a
19 q	Entity (please specify) Confirm that all responses provided in the above Section	n/a Yes
	Entity (please specify)	
20	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 20 a 21	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.	
20 a 21 3. AML, CT	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.	
20 20 a 21	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes
20 a 21 3. AML, CT	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Yes
20 20 a 21 3. AML, CT 22	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes Yes Yes
20 20 a 21 21 22 a 22 b 22 c	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes Yes Yes Yes Yes Yes
20 20 a 21 21 22 a 22 b 22 c 22 d	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 a 21 a 22 a 22 b 22 c 22 c 22 d 22 e	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes
20 a 21 3. AML, CT 22 a 22 b 22 c 22 d 22 e 22 f	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. 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 appropriate, provide any additional information/context to the answers in this section.	Yes
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing	Yes
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
20 a 21 a 21 a 22 a 22 b 22 c 22 d 22 o 22 f 22 g 22 h 22 i	Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
20 a 21 a 21 a 22 a 22 b 22 c 22 d 22 f 22 g 22 h 22 j 22 i 22 j	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. 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 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 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.	Yes Yes Yes Yes Yes Yes Yes Yes
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22 n Training and Education Yes 23 n Training and Education Yes 23 n Training and Education Yes 24 n Training and Education Yes 25 n Training and Education Yes 26 n Training and Education Monitoring 27 Is the Entity's AML. (TF & Sanctions Department? 28 is the Entity's AML. (TF & Sanctions Department? 29 Nest Company of the Education of the Education of Management Committee? If N, describe your practice in Management Committee? 26 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? 27 Does the Entity there a whistilablewer policy? 28 a 'If Y, provide further details 29 If N, clarity which questions the difference/s relate to and the branch/se that this applies to and the branch/se that this applies to the answers in this section. 4. ANTI BRIBERY & CORRUPTION 30 Has the Entity appointed a designation and section of the Education of the AMP of the	
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effectiveness of their ABC programme? 37 Does the Board receive, assess, and challenge regular	THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TW
27 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Yes	
38 Has the Entity's ABC Enterprise Wide Risk Assessment	
(EWRA) been completed in the last 12 months?	
A THIRD POOL ON BUILDING IN ANY INCIDING I	
No. If N. provide the date when the last ADC EWIDA was	
38 a If N, provide the date when the last ABC EWRA was completed.	
completed.	
39 Does the Entity have an ABC residual risk rating that is	
the net result of the controls effectiveness and the	
inherent risk assessment?	
40 Does the Entity's ABC EWRA cover the inherent risk	
components detailed below;	
40 a Potential liability created by intermediaries and other No	
third-party providers as appropriate	
40 b Corruption risks associated with the countries and	
industries in which the Entity does business, directly No	
or through intermediaties	
40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or No	
public officials	
40 d Corruption risks associated with gifts and hospitality.	
hiring/internships, charitable donations and political	
contributions	
Change is hypinger entirities that may contagilly	
orcease the Entity's corruption risk	
41 Does the Entity's internal audit function or other	
independent third party cover ABC Policies and Yes	
Procedures?	
Does the Entity provide mandatory ABC training to:	

42 a	Board and senior Committee Management	No
42 b	1st Line of Defence	No No
42 c	2nd Line of Defence	No
42 d	3rd Line of Defence	No No
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No ,
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	SPECIFICATION OF THE PROPERTY
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	No
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a .	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

employees Define the process, where appropriate, for terminating	Yes
employees Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk. Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News Outline the processes for the maintenance of internal "watchlists" Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? Does the Entity have record retention procedures that comply with applicable laws? If Y, what is the retention period? 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.	Yes
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Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News Outline the processes for the maintenance of internal "watchlists" Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? Does the Entity have record retention procedures that comply with applicable laws? If Y, what is the retention period? 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.	Yes Yes Yes Yes 5 years or more Yes
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similar document which defines a risk boundary around their business? Does the Entity have record retention procedures that comply with applicable laws? If Y, what is the retention period? 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. S SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes 5 years or more Yes
Does the Entity have record retention procedures that comply with applicable laws? If Y, what is the retention period? 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. S SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	5 years or more Yes
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. B. SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
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. B. SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. S. SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	V
to the answers in this section. S. SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	V
Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	V
Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	U
	V-a
	Yes
Product	Yes
Channel	Yes
Geography	Yes
Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
Transaction Monitoring	Yes Yes
Customer Due Diligence PEP Identification	Yes
Transaction Screening	Yes
Name Screening against Adverse Media/Negative	Yes
	Yes
Governance	Yes
Management Information	Yes
Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
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	No
Product	No
Channel	No.
	No
effectiveness components detailed below:	
	Yes
Couemana	Yes
List Management	Yes
1	News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance

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Fo -	T N 0	Iv.
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?	No
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	a fo
		n/a
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	Tes
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, CI	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
64 a	when conducting CDD? Select all that apply: Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers Other relevant parties	Yes Yes
65 d	What is the Entity's minimum (lowest) threshold applied	
66	to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography Business Type/Industry	Yes
67 a3	Legal Entity type	Yes Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
0. 40		
		PEP status, PEP relatives, PEP close associates
68	For high risk non-individual customers, is a site visit a	
vu	part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	
09	customers for Adverse Media/Negative News?	Yes
	cristotticia ini voisetae inemaniefanse inema;	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of extended and manual
	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	Yes
	they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
	Onboarding	Yes
71 a1		
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	Yes
	they are PEPs, or controlled by PEPs?	
	uncy and the s, or contaction by the to.	
	1-10/0 d -t d-fa-ad fa-ai-a based on right	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes .
		Yes
74 a3	3 – 4 years	
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	Deep the Cettle moletois and speed motifies an ourself	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	INO .
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	Prohibited
76 b	Respondent Banks	Always subject to EDD
		Aways subject to EDD
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	No EDD/restriction or prohibition
	Extractive industries	EDD on risk-based approach
76 d		
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 1	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
		EDD on risk-based approach
76 n	PEPs	
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
		Prohibited Prohibited
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	No EDD/restriction or prohibition
76 v	Unregulated charities	Prohibited
	Used Car Dealers	EDD on risk-based approach
76 w		
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	EDD also applied to:
11	in resultated, provide details of the resultation	Residence in geographic areas with a high AML-risk;
		Legal entities or legal agreements that serve as instruments for private wealth management;
		Cash intensive businesses;
		Ownership structures which appear unusual or excessively complicated
78	Does EDD require senior business management and/or	

70 0	If Y indicate who provides the approval:	Senior business management
78 a 79	Does the Entity have specific procedures for onboarding	Senior business management
15	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No .
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	n/a
O MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	n/a
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	FICO Tombeller (Siron)
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYM	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

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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	Regulation EU 2015/847 on information accompanying transfers of funds Law 209/08.11.2019 on payment services & NBR Regulation no 4/13.12.2019 Law 129/2019 on preventing and combating money laundering and terrorist financing &NBR Regulation 2/2019
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	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.	
40 04410	TIOUS	
10. SANC 98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions	Automated
102 a	screening? 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?	FICO Tonbeller (Siron); Refinitiv World Check
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
400 h	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 b		Aser for selecting enstatuers and neticinal exiters and for intentify transactional agra-
	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	the difference of the second s
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT (OFSI) European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data

106 f	Other (specify)	
		Black List, Local Juridisdiction Lists
		Black List, Local Jundisdiction Lists
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the entity updates their active manual and/or automated screening	
107 a	systems against: Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
107 D	Does the Entity have a physical presence, e.g. branches,	Jame day to 2 business days
100	subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No _
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11 TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have 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
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the statistics that the apparatus	
116	If appropriate, provide any additional information/context	
,,,,	to the answers in this section.	
12 QUALITY	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular	Yes
122	hasis? How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component based reviews
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
123 c	Governance	Yes Yes '
123 d	KYC/CDD/EDD and underlying methodologies	Tes .
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes Yes
123 h	Technology Transaction Monitoring	Yes
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 1	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	address, GPS location, and/or device ID?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration 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)

PROCREDIT BANK SA 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

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, STEFAN MANOLE (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the ers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, ANDREEA ICHIM (MLRC or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBD and that I am authorised to execute this declaration on behalf of the Financial Institution. Q are complete and correct to my honest belief,

04 06 2024

(Signature & Date)

04.06.2024

(Signature & Date)

