the Wolfsberg Group

Financial Institution Name: Location (Country) :

REYL & Cie Ltd Switzerland

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

No#	Question	Answer
1. ENTIT	TY & OWNERSHIP	
1	Full Legal Name	REYL & Cie Ltd
2	Append a list of foreign branches which are covered	
2	by this questionnaire	Zurich Lugano
3	Full Legal (Registered) Address	Rue du Rhône 4 CH-1204 Geneva
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	19th January 1988
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 symbol	Not Applicable
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	69% by Fideuram - Intesa Sanpaolo Private Banking SpA. Fideuram - Intesa Sanpaolo Private Banking SpA is 100% owned by Intesa Sanpaolo SpA.
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	Not Applicable
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Swiss Financial Market Supervisory Authority (FINMA) www.finma.ch
11	Provide Legal Entity Identifier (LEI) if available	549300KRHG5GM7DXKE41
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Intesa Sanpaolo SpA

4.9		
13	Jurisdiction of licensing authority and regulator of ultimate parent	Bank of Italy, European Central Bank
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	Yes
		No
14 c	Commercial Banking	
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
14 (Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	Corporate Finance, Asset Management, Asset Services, Entrepreneur & Family Office Services.
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)	Yes
15 a	If Y, provide the top five countries where the non- resident customers are located	Upon request
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$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.	Not Applicable
18	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
2. PRODU	JCTS & SERVICES	
2. PRODU	JCTS & SERVICES Does the Entity offer the following products and sprices:	
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	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes only for subsidiary(ies)
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	
19 19 a 19 a1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	only for subsidiary(ies)
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	only for subsidiary(ies)
19 a 19 a 19 a 19 a 1 a 1 a 1 a 1 a 1 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	only for subsidiary(ies) No No
19 a 19 a 19 a1 19 a1a 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	only for subsidiary(ies) No No Yes
19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d	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	only for subsidiary(ies) No Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 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 allow downstream relationships with foreign banks?	only for subsidiary(ies) No No Yes Yes
19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 e 19 a 1 f	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	only for subsidiary(ies) No No Yes Yes No Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	only for subsidiary(ies) No No Yes Yes No Yes
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 f 19 a 1 g 19 a 1 g 19 a 1 h 19 a 1 h	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	only for subsidiary(ies) No No Yes Yes No No No

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No 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 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remole Deposit Capture (RDC)	No
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 m 19 n	Trade Finance	No No
-	Virtual Assets	No No
19 o 19 p	For each of the following please state whether you	NO NO
	offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Not Applicable
19 q	Other high-risk products and services identified by the Entity (please specify)	_
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
21	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
3. AMI C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a		
22 b	Appointed Officer with sufficient	Yes
D	Appointed Officer with sufficient Adverse Information Screening	Yes Yes
	Adverse Information Screening	
22 c	Adverse Information Screening Beneficial Ownership	Yes Yes
22 c 22 d	Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 c 22 d 22 e	Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
22 c 22 d 22 e 22 f	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes Yes
22 c 22 d 22 e 22 f 22 g	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 c 22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
22 c 22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 c 22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes
22 c 22 d 22 e 22 f 22 g 22 h	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes



20	Considers Ashirib Decision	Vaa.
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o 23	Transaction Monitoring How many full time employees are in the Entity's	Yes 11-100
24	AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29,	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	Not Applicable
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
29	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable:
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Enlity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Enlity have a global ABC policy that:	
35 а	Prohibils the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	Not Applicable
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Enlity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
	2nd Line of Defence	
42 c		Yes
42 d	3rd Line of Defence	Yes
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
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
45	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
Control of the Paris of the Par	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at	
48		Yes
e.	least annually? Has the Entity chosen to compare its policies and procedures against:	Yes
48 a	Has the Entity chosen to compare its policies and procedures against:	
48 a	Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes
48 a1	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 Yes
48 a1 48 b	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	Yes Yes Yes
48 a1 48 b 48 b1	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 Yes
48 a1 48 b	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 retain a record of the results? Prohibit the opening and keeping of anonymous	Yes Yes Yes
48 a1 48 b 48 b1 49	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	Yes Yes Yes Yes Yes
48 a1 48 b 48 b1 49 49 a	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 Yes Yes Yes Yes Yes
48 a1 48 b 48 b1 49 49 a 49 b	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 Yes Yes Yes Yes Yes Yes Yes
48 a1 48 b 48 b1 49 49 a 49 b	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 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 Yes Yes Yes Yes Yes
48 a1 48 b 48 b1 49 49 a 49 b	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 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 dealing with another entity that provides services to shell banks	Yes Yes Yes Yes Yes Yes Yes Yes
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d	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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	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 dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
53	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
	TE A SANISTIONS DISK ASSESSMENT	
6. AML, CT	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 с	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 h 56	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	Not Applicable
57	Does the Enlity's Sanctions EWRA cover the inherent	
	risk components detailed below:	
57 a	risk components detailed below: Client	Yes
57 b	risk components detailed below: Client Product	Yes
57 b 57 c	risk components detailed below: Client Product Channel	Yes Yes
57 b 57 c 57 d	risk components detailed below: Client Product Channel Geography	Yes
57 b 57 c 57 d 58	risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
57 b 57 c 57 d 58	risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes Yes Yes
57 b 57 c 57 d 58 58 a 58 b	risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes Yes Yes Yes Yes Yes
57 b 57 c 57 d 58	risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes Yes Yes



me Screening	Yes
nsaction Screening	Yes
ining and Education	Yes
the Entity's Sanctions EWRA been completed in ast 12 months?	Yes
I, provide the date when the last Sanctions	Not Applicable
/RA was completed	Trut Applicable
irm that all responses provided in the above ion are representative of all the LE's branches	Yes
, clarify which questions the difference/s relate to d the branch/es that this applies to,	Not Applicable
oropriate, provide any additional mation/context to the answers in this section.	Not Applicable
nd EDD	
s the Entity verify the identity of the customer?	Yes
ne Enlity's policies and procedures set out when must be completed, e.g., at the time of parting or within 30 days?	Yes
ch of the following does the Entity gather and n when conducting CDD? Select all that apply:	
stomer identification	Yes
pected activity	Yes
lure of business/employment	Yes
rnership structure	Yes
oduct usage	Yes
rpose and nature of relationship	Yes
urce of funds	Yes
urce of wealth	Yes
each of the following identified:	
imate beneficial ownership	Yes
re ultimate beneficial owners verified?	Yes
thorised signatories (where applicable)	Yes
y controllers	Yes
ner relevant parties	Yes
t is the Entity's minimum (lowest) threshold ied to beneficial ownership identification?	10%
s the due diligence process result in customers iving a risk classification?	Yes
, what factors/criteria are used to determine the stomer's risk classification? Select all that apply:	
roduct Usage	Yes
eography	Yes
usiness Type/Industry	Yes
egal Entity type	Yes
dverse Information	Yes
Other (specify)	Amount of assets deposited, complex structures, etc.
nigh risk non-individual customers, is a site visit a of your KYC process?	No
, is this at:	
Onboarding	Please select
KYC renewal	Please select
Trigger event	Please select
Olher	Please select
lf yes, please specify "Other"	Not Applicable
s the Enlity have a risk based approach to ening customers for Adverse Media/Negalive s?	Yes
, is this at:	
Onboarding	Yes Yes
s the ening s? ', is th	Enlity have a risk based approach to customers for Adverse Media/Negalive



	V 45.2	Yes
69 a3	Trigger event 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?	Yes
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?	Automated
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
74 a	If yes, select all that apply:	No.
74 a1	Less than one year	No
74 a2 74 a3	1 – 2 years 3 – 4 years	Yes Yes
74 a3	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	PEP and high risk: annual medium-high risk: every 2 years medium-low / 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	Restricted
76 b	Respondent Banks	Prohibited
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	Restricted
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Restricted
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entities	Restricted
76 h	MSB/MVTS customers	Do not have this category of customer or industry
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
761	Nuclear power	Restricted
76 m	Payment Service Providers	Restricted
76 n	PEPs	EDD on risk-based approach
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
76 r	Red light businesses/Adult entertainment	Restricted
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibiled
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	Not Applicable
77	If restricted, provide details of the restriction	For restricted activities, potential accounts opening are subject to EDD and escalated to the Client Acceptance Committee that is competent to define, if applicable, the specific conditions to be applied to this entry into relation,
78	Does EDD require senior business management and/ or compliance approval?	Yes

A

Page 10 Does the Emily have specified procedurers for onbourding on sillows that land cleant money such as travyers, acconstraints, consultants, read cleants appeted to the process of the process of the cleants subject to EDD? 15 Does the Emily perform and disconstraints of the process of the cleants of the process of the cleants of the process of the cleants of the process of the process of the cleants of the process of			
onboarding on this be fail that old client money such as tayon, accountains, containable, call easily appared? Does the Entity by enform an additional control or quality review on clients subject to EDD? Cariforn that all responses provided in the above. Set a San Entity the proposes the difference of the additional information by the additional information by the additional information by the additional information provides any additional information by the additional informati	78 a	If Y indicate who provides the approval:	Both
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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)? 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 resubmissions and/or masking, of sanctions relevant information in cross border transactions? 101 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? 102 What is the method used by the Entity for sanctions screening? 103 If a vendor-sourced tools used? 104 If a vendor-sourced tool or both selected, what is the name of the vendor/tool? 105 If a vendor-sourced tool or both selected, what is the name of the vendor/tool? 106 Are internal system of vendor-sourced tools used? 107 If a vendor-sourced tool or both selected, what is the name of the vendor/tool? 108 When did you tast test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (I'O'ther' please explain in Question 110) 109 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?		law applicable to the Entity, including with respect to its business conducted with, or through accounts held	Yes
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beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity for sanctions screening? Both Automated and Manual Both Automated and Manual If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? Both Refinitiv / WorldCheck Bottomline Technologies / GTSanctions 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) We she Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? Yes	100	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	Yes
Screening? If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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) Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? Both Refinitiv / WorldCheck Bottomline Technologies / GTSanctions * 1 year * 1 year * 1 year Yes * 2 yes	101	beneficial ownership information collected by the Entity, during onboarding and regularly thereafter	Yes
selected: 102 a1 Are internal system of vendor-sourced tools used? Both 102 a1a If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? Refinitiv / WorldCheck Bottomline Technologies / GTSanctions 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) 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	102		Both Automated and Manual
102 a1a If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 102 a2 When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) 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? Refinitiv / WorldCheck Bottomine Technologies / GTSanctions **All Year** **I year** **Yes** Yes**	102 a		
102 a1a If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 102 a2 When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) 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? Refinitiv / WorldCheck Bottomine Technologies / GTSanctions **All Year** **I year** **Yes** Yes**	102 a1		Both
true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110) 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		If a 'vendor-sourced tool' or 'both' selected, what	
including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	102 a2	true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	< 1 year
104 What is the method used by the Entity? Combination of automated and manual	103	including at a minimum, entity and location information, contained in cross border transactions	Yes
	104	What is the method used by the Entity?	Combination of automated and manual

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105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Swiss SECO, Malta, Singapore, UAE Lists / Used for screening customers and beneficial owners and for filtering transactional data
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
110	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 F	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b 112 c	1st Line of Defence 2nd Line of Defence	Yes 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?	
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes



115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
116	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
12. QUALITY	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 Enlity 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.	Not Applicable
120	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 а	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions	Yes
123	Training & Education Other (specify)	Yes Not Applicable
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	Not Applicable
126	If appropriate, provide any additional information/context to the answers in this section,	Not Applicable
14. FRAUI		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible	Yes

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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
132	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Volumes and the complete burgets are accessed to the complete and the complete burgets are accessed to the complete and the complete burgets are accessed to th REYL & Cie Ltd (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, Koger Münger (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. Paolo Giacomelli (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and connect to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. h 01.09.2023 (Signature & Date) 01.09.2023

(Signature & Date)