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#		Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	REYL & Cie Ltd
2	Append a list of foreign branches which are covered 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



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14 Multilatorial Development Bank	14 g	Securities Services/Custody	Yes
Tell	14 h	Broker/Dealer	No
Wealth Management Yes	14 i	Multilateral Development Bank	
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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	M.
19 c	Cross-Border Remittances	No
19 d		No
19 u	Domestic Bulk Cash Delivery Hold Mail	No
		Yes
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 13	Virtual Asset Service Providers (VASPs)	No
19 (4	eCommerce Platforms	No
19 (5	Other - Please explain	
	·	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
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	Check cashing service	M-
19 p1a	if yes, state the applicable level of due diligence	No St.
19 p2	Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Yes
19 p3	Foreign currency conversion	Due diligence
19 p3a	If yes, state the applicable level of due diligence	Yes
19 p4	Sale of Monetary Instruments	Identification and verification
19 p4a	If yes, state the applicable level of due diligence	No 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 а	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. AML. C	FF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	
22 g 22 h		Yes
and the last	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22	Sanctions	Yes



22 a Training and de Justiellen Ves	22 m	Suspicious Activity Reporting	Vaa
Parameter Para			Yes
ANU, CTF & Sanctions Compliance Department? 24 Is the Entity's ANL, CTF & Sanctions policy approved at latest annually by the Source of equivalent Source of the Compliance Department of Management Committee? I'M, describe your practice of Countries of I'M, describe your practice of Countries of I'M, describe your practice of Sanctions programment of the ANL, CTF, & Sanctions programment of Sanctions of Sanctions programment of Sanctions of			
at least annually by the Board or equivalent Senior Management Committee IVI, disorther your practice in Question 25. Does the Board receive, assess, and challenge regular reporting on the stebs of the AML, CTF, & Sanders programme? Does the Entity you sell into parties to carry out any outperformed to the AML of CTF & Sanders programme? If Y, provide further details If Y, provide further details to the above Section are representative of all the LE branch is because and the branch/les that this applies to the and the branch/les that this applies to the and the branch/les that this applies to the answers in this section. A. ANTI BRIBERY & CORRUPTION If yet the Entity According to the analysis of the anal		How many full time employees are in the Entity's	
Sendons programme? 28 Oces the Entity use third parties to carry out any components of the AML_CFT & Sanctions programme? 29 a If Y, provide further details 18 Y, provide further details 19 Oces the entity have a whiteleblower policy? 20 Confirm that all responses provided in the above Section are representative of all the LES branches 20 a If Y, provide further details 20 a If Y, provide further details 20 Oces the entity have a whiteleblower policy? 21 Confirm that all responses provided in the above Section are representative of all the LES branches 22 a If appropriate, provide any additional information of the AML of the LES branches 23 a If Appropriate, provide any additional information of the AML of the AML of the AML of the AML of the American Section of the AML	24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice	Yes
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28 a Confirm that all responses provided in the above Section are representative of all the LE's tranches 28 a If N, clarify which questions the differenceir relate to and the branchises that this applies to. 29 If appropriate, provide any additional informationicontext to the answers in this section. 29 If appropriate, provide any additional informationicontext to the answers in this section. 30 A Has the Entity documented polloise and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 31 Does the Entity have an enterprise wide programme has test minimum ABC standards? 32 Has the firstly lappointed a designated officer or officers with sufficience apprention of the entity appropriate (adequate and the programme?) 33 Does the Entity have adequate staff with appropriate levels of experience/Appends to implement the ABC programme? 34 Is the Entity have a global ABC policy that includes promising, offering, glying, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. 35 Dincludes a prohibition against the fatilification of books and records (this may be within the ABC policy for any other policy applicable to the Legal Entity?) 36 Does the Entity ABC programme? 37 Does the Band receive of this may be within the ABC policy for any other policy applicable to the Legal Entity? 38 Does the Entity have an ABC residual risk rating that is the not result of the controls in fleate to monitor the effectiveness of their ABC programme? 38 He the Entity's ABC Enterprise Wide Risk Assessment? 40 Does the Entity have an ABC Estival controls in fleate to monitor the effectiveness of their ABC EWRA was somethed in the leaf I Condher? 41 Petrotal iliability created by intermediaries and	26 a	If Y, provide further details	Not Applicable
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Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate stiff with appropriate levels of experience/expertise to implement the ABC programme? Levels of experience/expertise to implement the ABC programme? The Entity ABC programme applicable to: Both joint ventures and third parties acting on behalf of the Entity Pes Both joint ventures and third parties acting on behalf of the Entity Pes This includes promising, offering, giving, solicitation or receiving of anything of value, circetly or indirectly, if improperty intended to influence action or obtain an advantage. Includes enhanced requirements regarding interaction with public officials? Includes an ABC programme? The Both intervence of the Includes anything of value, paint the fatsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? Des the Entity have controls in place to monitor the effectiveness of their ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWA) been completed in the last 12 months? In N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the interent risk assessment? Entity to the controls effectiveness and the interent risk assessment? Per service of the ABC programme? Per service of th	4. ANTI	BRIBERY & CORRUPTION	
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Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Does the Entity's ABC EWRA cover the inherent risk components detailed below: Yes Yes	34		Both joint ventures and third parties acting on behalf of the Entity
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reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Not Applicable Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Yes Yes Yes	36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Not Applicable Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and	37		Yes
If N, provide the date when the last ABC EWRA was completed. Not Applicable Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and	38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
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		If N, provide the date when the last ABC EWRA was	Not Applicable
components detailed below: Yes 40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	Yes
		components detailed below:	Yes
outer unite-party providers as appropriate	40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes



40 Б	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 Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	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
C 410 0	TE & CANOTICUE DO VOITE À TOUR	
	TF & 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	least annually? Has the Entity chosen to compare its policies and	Yes
	procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
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 U		
	Prohibit dealing with another entity that provides services to shell banks	Yes
49 e 49 f	Prohibit dealing with another entity that provides	Yes Yes
49 e	Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

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 New	s Yes
49 п	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
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	Does the Entity's AML & CTF EWRA cover the	
6. AML, C 54	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Vac
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 c 55 d 55 c 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 a 54 b 55 d c 55 d c 55 a 55 a 55 c 55 d 55 c 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 65 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 555 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 555 a 555 c 55 d 55 e 55 f 55 a 55 f 55 7 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 65 f 55 g 55 h 56 57 57 a 57 a 57 c 57 d 58 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 555 b 55 c 55 d 55 e 55 f 55 a 55 f 55 7 57 a 57 a 57 c 57 d 58 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 b 54 c 54 c 54 c 55 c 55 a 55 c 55 c 55 d 55 c 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Not Applicable Yes Yes



58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	Not Applicable
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
61	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
7. KYC, C	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e 64 f	Product usage	Yes
64 g	Purpose and nature of relationship Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	Yes
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 с	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
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 67 a3	Geography Business Type fleduates	Yes
67 a4	Business Type/Industry Legal Entity type	Yes
67 a5	Adverse Information	Yes Yes
67 a6	Other (specify)	Amount of assets deposited, complex structures, etc
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3 68 a4	Trigger event Other	Please select
68 a4a	If yes, please specify "Other"	Please select Not Applicable
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes



60 22	Trigger event	lv
69 a3	Trigger event	Yes
	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
73	Does the Entity have policies, procedures and processes	, 1010110100
	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:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	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	
76 f	General Trading Companies	Restricted
		Always subject to EDD
76 g	Marijuana-related Entities	Restricted
76 h	MSB/MVTS customers	EDD on risk-based approach
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
161	Nuclear power	Restricted
76 m	Payment Service Providers	Restricted
76 n		EDD on risk-based approach
76 o	BED OL A	EDD on risk-based approach
76 p	DED D	
76 q	B	EDD on risk-based approach
76 r	D I I I I I I I I I I I I I I I I I I I	EDD on risk-based approach
		Restricted
76 s		EDD on risk-based approach
76 t		Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w		EDD on risk-based approach
76 x	16: 14 :0 : - ::	EDD on risk-based approach
76 y	Other (specify)	Not Applicable
77		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?	ves

70 -	I KV indicate who are identifying	T
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
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	Not Applicable
82	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
8. 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?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	WordiCheck Lexis Nexis
84 b2	When was the tool last updated?	<1 year
84 Ь3	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	Not Applicable
91	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
O DAVA	ENT TRANSPARENCY	
9. PATIVII 92	AND THE PROPERTY OF THE PROPER	
J.L.	Does the Entity adhere to the Wolfsberg Group	Yes
	Payment Transparency Standards?	



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 61	If Y, specify the regulation	The Bank is notably subject to the Swiss Anti-Money Laundering Act (AMLA), the Ordinance of the Swiss Financial Market Supervisory Authority on Money Laundering (AMLO-FINMA) and the Agreement on the Swiss Ban's Code of Conduct (CDB) with regards to the execise of due diligence as amended from time to time.
93 c	If N, explain	Not Applicable
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
97	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
10. SAN	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' 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?	WorldCheck 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)	<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?	Combination of automated and manual



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 c	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 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
11 TPAINE	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	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

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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. QUAL	ITY 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.	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	Yeariy
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 123 d	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k		Yes
123	Other (specify)	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
4. FRAU	ID	
127	Does the Entity have policies in place addressing	Yes
128	Does the Entity have a dedicated team responsible	Yes
	<u> </u>	



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)

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)

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.

|, Paolo Giacomelli (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 Gjacomelli (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDO are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

(Signature & Date)

18.4.2023 (Signature & Date)