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

the Wolfsberg Group

Financial Institution Name: Location (Country) : IndusInd Bank Limited India

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. It 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. It 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.

Question	Answer
& OWNERSHIP	
Full Legal Name	Industrid Bank Limited
	Industria Bank Limited
Append a list of foreign branches which are covered	Gujarat International Finance Tec-City (GIFT City)
by this questionnaire	Outract international Finance Too only (on Forty)
Full Legal (Registered) Address	2401, General Thimmayya Road, Cantonment, Pune – 411001, Maharashtra, India
	2001, 0000000
	8th Floor, Tower -1, One India Bulls Centre, 841 Senapati Bapat Marg, Elphistone road (west),
above)	Mumbai-400013, Maharashtra, India.
Date of Entity incorporation/establishment	31st January 1994
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Select type of ownership and appending ownership	
chart if available	
Publicly Traded (25% of shares publicly traded)	Yes
If Y, indicate the exchange traded on and ticker	1, BSE (formerly Bombay Stock Exchange) (BOM: 532187)
symbol	2. National Stock Exchange (INDUSINDBK)
	3. Luxembourg Stock Exchange (GDR-III 202)
Member Owned/Mutual	No
Government or State Owned by 25% or more	No
Privately Owned	No
	NA
beneficial owners with a holding of 10% or more	
E .	· · · · · · · · · · · · · · · · · · ·
	Bank has not issued any bearer shares
snares	Shares
	i e
Dece the Entity or any of its branches accounts under	
	No
which operate under an OBL	NA ·
	8
Does the Bank have a Virtual Bank License or	
provide services only through online channels?	No
Name of primary financial regulator/supervisory	Reserve Bank of India (RBI)
authority	17000140 Dank Of Blold (INDI)
Provide Legal Entity Identifier (LEI) if available	LEI Number :- 335800JDVJ8HSXG9G512
Provide Legal Entity Identifier (LEI) if available	
Provide Legal Entity Identifier (LEI) II available	ELI Namber 1- 33300030 V301 (0X3333 12
Provide Legal Entity Identifier (LEI) if available	ELI NUMBER : 3330000 301 0X333312
	ELI Number - 3330000 30 No. CO. CO.
Provide the full legal name of the ultimate parent (if	NA
	Full Legal Name Append a list of foreign branches which are covered by this questionnaire Full Legal (Registered) Address Full Primary Business Address (if different from above) Date of Entity incorporation/establishment Select type of ownership and append an ownership chart if available Publicly Traded (25% of shares publicly traded) If Y, Indicate the exchange traded on and ticker symbol Member Owned/Mutual Government or State Owned by 25% or more Privately Owned If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more % of the Entity's total shares composed of bearer shares Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? If Y, provide the name of the relevant branch/es which operate under an OBL Does the Bank have a Virtual Bank License or provide services only through online channels? Name of primary financial regulator/supervisory

Ultimate patent: NOVA - Reserve Sank Of IndiscRB()			
Select the closest value 16 Select the closest value 16 Comment of the comment	13		INDIA - Reserve Bank Of India(RBI)
Retail Banking Ves		ultimate parent	The state of the s
Retail Banking Ves			
Retail Banking Ves			
14 b Private Banking Yes	14	Select the business areas applicable to the Entity	
Private Banking	14 a	Retail Banking	Yes
14 c Commercial Banking Yes	14 b		
14 d	14 c		
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14			
Securities Services/Custody No			
14 in Broker/Dealer No No			
Multislateral Development Bank No No No	_		No
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9 a1h2 MVTSs No			
9 a1h2 MVTSs No	19 a1h1	MSBs	No.
	19 a1h2		
7 FOFS NO			
	. 5 @ 1113	1 37 3	NO

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	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may	110
	then offer third party payment services to their customers?	No.
19 1	If Y, please select all that apply below?	
19 2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 5	Other - Please explain	× y
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	Yes
19 m	Stored Value Instruments	
	Trade Finance	Yes
19 n		Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Identification and verification
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.	DD drawing upto INR 50000.00 ID and Verification proofs are sought.
19 q	Other high-risk products and services identified by the Entity (please specify)	Not Applicable
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.	NA .
21	If appropriate, provide any additional information/context to the answers in this section.	NA .
	CTF & 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 experience/expertise	
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
	Independent Testing	Yes
22 0	acpondont resuing	100
22 g	Pariodic Pavious	V-a
22 h	Periodic Review	Yes
22 h 22 i	Policies and Procedures	Yes
22 h 22 i 22 j	Policies and Procedures PEP Screening	Yes Yes
22 h 22 i	Policies and Procedures	Yes

00	Consisions Astrike Dancetter	V.
22 m 22 n	Suspicious Activity Reporting Training and Education	Yes Yes
22 n	Training and Education Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Yes 11-100
24	Is the Entity's AML, CTF & Sanctions 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	NA
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.	NA
29	If appropriate, provide any additional information/context to the answers in this section.	Both Quarterly and Annually reports are submitted to Board.
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 35	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Third parties acting on behalf of the Entity
35 a	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.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	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)?	Yes
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?	No
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?	No
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	No
40 a	Potential liability created by intermediaries and	No

40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or through intermediaries	No
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	No
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No
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	Yes
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
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.	NA .
45	If appropriate, provide any additional information/context to the answers in this section.	NA .
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 least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	Not Applicable
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 NBF/s	Yes
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

Basuaspicorenially auspicous activity identified by employees Yes			
terminating out all age customer relationships due to financial crime in its process for exting clients for francial crime reasons that age across the artifly. 19 Define the process of control is talently and control of financial crime reasons that age across the artifly. 19 Define the process are criments is talently and for financial crime reasons if they seek to re-establish a relationship. 19 Define the reasons if they seek to re-establish a relationship. 19 Define the reasons if they seek to re-establish a relationship. 19 Define the processas regarding screening for successing for successing for successing the relationship. 19 Define the processas for the maintenance of internal wardships. 10 Outline the processas for the maintenance of internal wardships. 10 Define the Eritly when record relationship or successing for successing the relationship or successing for successing the relationships. 10 Define the Eritly when record relationship procedures that comply with supplicable bear and borrows and comply with supplicable bear. 11 Define the Eritly when record relationship procedures that comply with supplicable bear. 12 Confirm that all responses provided in the above Section are represented or of the processing of t	49 i	issues/potentially suspicious activity identified by employees	Yes
crime reasons that applies accoss the entity, including foreigh prometry and affiliative with the process and controls to identify and handle customers that were proviously evided for financial crime reasons. If they seek it is resistable as electrolish and customers that were proviously evided for financial crime reasons. If they seek it is resistable as electrolish. 49 m Cutties the processes from a control to its default and a composition. PCPs and Advance Medical Repairs Network. 50 Cutties the processes for the maintenance of internal watchinsh. 51 Dest the Entity defined a risk to location. 52 Confirm that all responses provided in the above comply with applicable business. 53 If Y, what is the reternion period? 54 Confirm that all responses provided in the above control and the transmission of the control and the control	49 j	terminating existing customer relationships due to	Yes
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sanctions, PEPs and Advance MedianNegative News 4 n	491	handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes
Internal *NextChiefes* 3	49 m		Yes
similar document which defines a risk boundary around their business? 51 a Does the Entity have record retention procedures that comply with applicable tave? 51 a If Y, what is the retention period? 52 Confirm that all responses provided in the above section are representative of all the LE's branches 52 a If N, ctarify which questions the difference's relate to and the branch's that this applies to. 53 If appropriate, provide any additional information/currient to the answers in this section. 54 a Citient Texas ANCTIONS RISK ASSESSMENT 55 Does the Entity's ANL & CITE EWRA cover the inherent risk components detailed below: 55 a Transaction Monitoring 56 a Transaction Monitoring 57 a Name Screening against Adverse MedianNegative News 58 b Name Screening against Adverse MedianNegative News 57 d Does the Entity's MAL & CITE EWRA been completed in the section of the last Lamburgh of the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the section of the last LAML & CITE EWRA been completed in the last LAML & CITE EWRA been completed in the last LAML & CITE EWRA cover the inherent risk components detailed below: 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 58 Description of the provide the active whom the last AML & CITE EWRA was completed. 58 Description of the last LAML & CITE EWRA cover the inherent risk components detailed below: 58 Description of the last LAML & CITE EWRA cover the inherent risk components detailed below: 59 Covernance 50 Description of the last LAML & CITE EWRA cover the inherent risk components detailed below: 50 Description of the last LAML & CITE EWRA cover the inherent risk co	49 n		Yes
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	00 4		Yes
58 d Management Information Yes		Customer Due Diligence	
	58 b 58 c	Customer Due Diligence Governance List Management	Yes

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58 e 58 f	Name Screening	Yes
	Transaction Screening	Yes
58 g 59	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.	NA .
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.	NA .
61	If appropriate, provide any additional information/context to the answers in this section.	NA .
7. KYC.	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	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	No 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	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Monthly Income/annual Turnover, Politically Exposed Person (PEP)
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a 1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4 68 a4a	Other If yes, please specify "Other"	NO NA
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

Page 7

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72 73	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
/3	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:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	No
74 a4 74 a5	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 40	Other (Please specify)	NA .
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
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	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v		Prohibited
76 W	Unregulated charities Used Car Dealers	
		EDD on risk-based approach
76 x 76 y	Virtual Asset Service Providers Other (specify)	Prohibited Benami Accounts/Anonymous Account & Accounts in Fictitious name- Prohibited
77	If restricted, provide details of the restriction	Bank has implemented process to restrict the customers with specific customer type, nature of activity at entry level. No relationship will be extended to these customers.
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Senior business management
70 a 79	Does the Entity have specific procedures for	Control desired menegement
	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	NA
82	If appropriate, provide any additional information/context to the answers in this section.	NA ·
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes .
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Report based monitoring of transactions are done.
84 Ь	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?	Clari5
84 b2	When was the tool last updated?	Other - Please explain (in Question 91)
84 b3	When was the automated Transaction Monitoring application last calibrated?	1-2 years
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	NA S
91	If appropriate, provide any additional information/context to the answers in this section.	On regular basis, As and when required
a DAVE	ENT TOANSDADENCY	
9. PAYM 92	ENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group	

93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	(i) Prevention of Money Laundering Act, 2002 (ii) Prevention of Money-Laundering (Maintenance of Records) Rufes, 2005 and amended updated till March 07, 2023) (iii) Master Direction on KYC issued by Reserve Bank of India and amended updated till November 06, 2024
93 с	If N, explain	NA
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.	NA .
97	If appropriate, provide any additional information/context to the answers in this section.	NA NA
10. SANO		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at for	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit end/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?	Accuity
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)	Other
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)	HM(Her Majesty UK) - Sanctioned Lists US Government Officials - negative list published by US Govt. BIS (Bureau of Industry and Security) - Lists published by US Dept. of Commerce
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.	NA
110	If appropriate, provide any additional information/context to the answers in this section.	On regular basis
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 Ь	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 112 e	3rd Line of Defence Third parties to which specific FCC activities have	Yes
	been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
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.	NA
116	If appropriate, provide any additional information/context to the answers in this section.	NA .
	TY 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.	NA
120	If appropriate, provide any additional information/context to the answers in this section.	NA .
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?	Ýes
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	Component-based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 u	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Тесhпоlоду	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k 123 l	Training & Education Other (specify)	Yes
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.	N 6
126	If appropriate, provide any additional information/context to the answers in this section.	·
14. FRAU	ID.	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

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

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
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