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Financial Institution Name:	FirstRand Bank Limited
Location (Country) :	South Africa

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	FirstRand Bank Limited
2	Append a list of branches which are covered by this questionnaire	Kindly refer to the attached simplified group structure.
3	Full Legal (Registered) Address	Merchant Place, corner of Fredman Drive and Rivonia Road, Sandton, 2196
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	11 January 1929
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	FirstRand Bank Limited is a wholly owned subsidiary of FirstRand Limited. FirstRand Limited is a public listed company, with presence on the Johannesburg Stock Exchange.
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
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) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	FirstRand Bank Limited conducts the business of a bank by means of its FNB Channel Islands Branch, authorised in Guernsey.
9	Name of primary financial regulator / supervisory authority	The South African Reserve Bank (Prudential Authority)
10	Provide Legal Entity Identifier (LEI) if available	ZAYQDK TCA TIXFF 90QY690

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11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	FirstRand Limited
12	Jurisdiction of licensing authority and regulator of ultimate parent	South Africa
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services/ Custody	Yes
13 h	Broker/Dealer	Yes
13 i	Multilateral Development Bank	No
13 j	Other	The predominant banking activities of FirstRand Bank Limited consist of a set of transactional, lending, investment and insurance products and services.
14	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where off-shore means not domiciled in the jurisdiction where bank services are being provided) ?	No
14 a	If Y, provide details of the country and %	N/A
15	Select the closest value:	
15 a	Number of employees	10001+
15 b	Total Assets	Greater than $500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
16 b	If appropriate, provide any additional information / context to the answers in this section.	There are known data and coverage gaps in the FirstRand Control environment and these are addressed on a prioritised basis. Where possible, manual and/or compensatory controls are implemented.

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2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	Yes
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	No
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	Yes
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	Yes
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	No
17 b	Private Banking (domestic & international)	Yes
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	Yes
17 e	Stored Value Instruments	Yes
17 f	Cross Border Bulk Cash Delivery	Yes
17 g	Domestic Bulk Cash Delivery	Yes
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	Yes
17 l	Hold Mail	No
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	Yes
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	Following a Group decision taken, the provision of this service will be discontinued from December 2018 in respect of foreign banks. This service will however continue to be provided for subsidiaries of the FirstRand Group.
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Some branches within FirstRand Limited may not offer all the aforementioned products/services. FirstRand Limited provides a wide range of services- from retail product offerings to investment offerings and corporate investment products.
18 b	If appropriate, provide any additional information / context to the answers in this section.	Please kindly refer to the attached Annexure A for additional information.

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3. AML, CTF & SANCTIONS PROGRAMME		
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	Yes
19 b	Cash Reporting	Yes
19 c	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 l	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	50+
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Yes
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
23 a	If Y, provide further details	Third parties are utilised to perform functions such as record keeping, document retention and sanctions and PEP screening on behalf of certain business units. In limited instances, these third parties do perform customer due diligence on behalf of the Bank.
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are Representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	There are known data and coverage gaps in the FirstRand Control environment and these are addressed on a prioritised basis. Where possible, manual and/or compensatory controls are implemented.

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4. ANTI BRIBERY & CORRUPTION		
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	No
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	Yes
29 b	Third parties acting on behalf of the Entity	Yes
30	Does the Entity have a global ABC policy that:	
30 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
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 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
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	
33 a	If Y select the frequency	
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No

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35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 c	Transactions, products or services, including thosethat involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and Senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	A Group ABC policy requiring all subsidiaries to align to the requirements is in effect. A detailed assessment of each subsidiary is still due to take place and upon completion thereof the exact details as to the differences will be available.
39 b	If appropriate, provide any additional information / context to the answers in this section.	The ABC Framework & Policy have been developed and the implementation of risk management plans and risk assessments are underway. Whistleblowing procedures are implemented with the whistleblowing line outsourced to a third party.

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5. POLICIES & PROCEDURES		
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	No
42 a1	If Y, does the Entity retain a record of the results?	Not Applicable
42 b	EU Standards	No
42 b1	If Y, does the Entity retain a record of the results?	Not Applicable
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 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
43 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	No
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 Years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	The higher of the host or home principle is applicable, which means that should a subsidiary have a local legislative requirement which is of a higher standard than that of a requirement contained within a Group policy/standard, then the stricter requirement will be the applicable one to follow.

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6. AML, CTF & SANCTIONS RISK ASSESSMENT		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	No
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	Kindly refer to the Annexure A attached hereto for additional information.
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	No
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	No
52 a	If N, provide the date when the last Sanctions EWRA was completed.	Kindly refer to the annexure A attached hereto.
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
53 b	If appropriate, provide any additional information / context to the answers in this section.	

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7. KYC, CDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	No
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	Kindly note that the response to 48 e is 'No'.

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61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	No
62 b	KYC renewal	Yes
62 c	Trigger event	No
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	No
63 b	Manual	Yes
63 c	Combination of automated and manual	No
64	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
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	Yes
66 b	Manual	Yes
66 c	Combination of automated and manual	Yes
67	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
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

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70	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?	
70 a	Non-account customers	None of the above
70 b	Offshore customers	EDD on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD on a risk based approach
70 j	Atomic power	EDD on a risk based approach
70 k	Extractive industries	EDD on a risk based approach
70 l	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	EDD on a risk based approach
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	EDD on a risk based approach
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	EDD on a risk based approach
70 r	Marijuana	EDD & Restricted on a risk based approach
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	Additionally; Foreign PEPs, Persons of Interest, MSBs, foreign charities, high commissions and embassies of high risk jurisdictions, arms dealers, vostro accounts, second hand gold and scrap metal dealers and trade/dealing/breeding endangered or protected species.
71	If restricted, provide details of the restriction	Please refer to Annexure A.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

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8. MONITORING & REPORTING		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	Yes
75 b	Manual	Yes
75 c	Combination of automated and manual	Yes
76	If manual or combination selected, specify what type of transactions are monitored manually	The system known as Actimize SAM is the Group approved transaction monitoring system utilised to detect potentially suspicious and unusual transactions.
77	Does the Entity have regulatory requirements to report currency transactions?	Yes
77 a	If Y, does the Entity have policies, procedures andprocesses to comply with currency reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
9. PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	The National Payment System Act No. 78 of 1998, Directive No.1 of 2015 as issued by the South African Reserve Bank, FATF Recommendation 16 and Directives are taken into account.
81 c	If N, explain	FirstRand confirms adherence to the Wolfsberg Transparency Principles for payments as far as is reasonably possible. FirstRand is a SWIFT member, subscribing to the payment message standards as set out in the Wolfsberg Statement on Payment Message Standards relative to MT202/202COV/MT205/205COV since its inception.
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes

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84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the aboveSection PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	The Group is required to adhere to the Cross-Border and Domestic Payment Message Standard, which sets out the minimum requirements insofar as payment message standard are concerned. Franchises/subsidiaries not in full adherence are required to implement resolutions to address deficiencies they become aware of.
10. SANCTIONS		
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
87	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
88	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
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	No
90	What is the method used by the Entity?	
90 a	Manual	Yes
90 b	Automated	Yes
90 c	Combination of Automated and Manual	Yes
91	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
92	What is the method used by the Entity?	
92 a	Manual	Yes
92 b	Automated	Yes
92 c	Combination Automated and Manual	Yes
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 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
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data

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93 f	Other (specify)	BL-BANKING COMMISSION,(SWITZERLAND), DFAT, FDFA-(SWITZERLAND), MINEFI, RSA-AT-SOUTH AFRICAN POLICE- UNITED NATIONS SANCTIONS UNSCR 1267–AL QAIDA/TALIBAN, SECO- (SWITZERLAND), SECO-TUN- TUNISIA(SWITZERLAND), UN-CIAC, IMHA-BTO- INDIA-MINSTRY OF HOME AFFAIRS, RBI-SANC- INDIA
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:	
95 a	Customer Data	Updates to the sanctions lists are uploaded at the end of each business day and screening against the updated list is done the following morning.
95 b	Transactions	Updates to the sanctions lists are uploaded at the end of each business day and screening against the updated list is done the following morning.
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
97 b	If appropriate, provide any additional information / context to the answers in this section.	The FirstRand Group will not knowingly or deliberately engage with sanctioned entities/parties/persons as per the Group Sanctions Standard and Financial Crime Policy.
11. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	Yes
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Yes
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes

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101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	Financial crime training comprises of general awareness training, targeted and functional training. The training programme applies to all employees, including temporary employees and contractors. Employees are required to complete general awareness training at least annually.
12. QUALITY ASSURANCE /COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	
13. AUDIT		
106	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 and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Component based reviews

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108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 l	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above Section,AUDIT are representative of all the LE's branches	Yes
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	In addition to audits performed, it is possible that non-compliance issues may be raised by a business unit/franchise. In this case all non-compliance with policy requirements as well as legislative requirements are logged on the Group system (Archer), which is used to track and monitor these findings.

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FIRSTRAND

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.2

Declaration Statement

Declaration Statement 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)

FirstRand Bank Limited 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.

FirstRand Bank Limited 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.

FirstRand Bank Limited recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

FirstRand Bank Limited 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 on an annual basis.

FirstRand Bank Limited commits to file accurate supplemental information on a timely basis.

I, Suresh Chaytoo (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 **FirstRand Bank Limited**.

I, Nicholas Litton (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of **FirstRand Bank Limited**.

17 July 2018
Suresh Chaytoo

17 July 2018
Nicholas Litton

FIRSTRAND BANK

Annexure A: Additional information relating to the Wolfsberg Questionnaire (2018)

Question 17 (a)1-(a)7:	The FirstRand Group does not offer nested/downstream correspondent banking services to non-FirstRand Group customers. FirstRand Group (South Africa) does facilitate multi-currency nostro account payments that are banked by FirstRand subsidiaries. These foreign currency accounts are therefore only used to facilitate payments in respect of FirstRand customers. All FirstRand customers are screened against relevant sanction lists and all necessary Know Your Customer ("KYC") due diligence is performed in respect of same. There are limited instances where FirstRand may accept payment instructions directly from the customer of a respondent bank and to this end it would be required for the respective business unit involved in the transaction to be satisfied that the respondent bank has verified the identity and performed on-going due diligence on its clients having direct access to the account of the correspondent bank, and is able to provide pertinent client due diligence data in this regard upon request.
Question 17 (a)8-(a)10	It is possible for correspondent banking services to be rendered to regulated MSBs/MVTS. Currently there are no automated processes in place to identify downstream relationships with MSBs/MVTs, however, should any downstream relationships exist, these would be in respect of FirstRand Group Customers as per the aforementioned response to Question 17(a)1 -(a)7.
Q19 a	The Group does not have a separately appointed Sanctions Officer as South African legislation does not require the appointment of a Sanctions Officer by Statute. Executive custodianship of the sanctions compliance is vested in the Group Compliance Executive and delegated to various Compliance and Operational functions in the Group. The Group Executive holds a

	statutory appointment for AML Compliance in accordance with the Financial Intelligence Centre Amendment Act. Ultimate accountability for compliance vests in the Board of Directors.
Question 24 b	The Bank is required to comply with applicable anti-money laundering, anti-terrorism laws and other regulations in South Africa. These laws and regulations require the Bank, among other things, to adopt and enforce anti-money laundering and counter terrorist financing ("AML/CTF") policies and procedures and to report suspicious and unusual transactions terrorist activity and cash threshold reports to the Financial Intelligence Centre. While the Bank has adopted policies and procedures aimed at detecting and preventing the use of its banking platforms for money laundering and terrorist financing activities by terrorists and terrorist-related organisations and individuals generally, such policies and procedures may not completely eliminate instances in which the Bank may be used by other parties to engage in money laundering or other illegal or improper activities. To the extent the Bank may fail to fully comply with applicable laws and regulations, the relevant government agencies to which it reports have the power and authority to impose fines and other penalties on the Bank. In addition, the Banks business and reputation could suffer if customers use it for money laundering or illegal or improper purposes. There are known data and coverage gaps in the FirstRand Control environment and these are addressed on a prioritized basis. Where possible, manual and/or compensatory controls are implemented.
Questions 25 & 26:	FirstRand's ABC Framework & Policy set minimum ABC principles for the Group. Going forward, ABC minimum standards will be developed and risk assessments will be conducted.
Question 27:	The ownership of the ABC Programme vests with the Group Executive Compliance Officer. This Programme is managed via the functional compliance and operating structures which report to the Group Executive Compliance Officer.
Question 28:	Subsequent to the completion of FirstRand's enterprise wide ABC risk assessment, FirstRand will review its ABC staff compliment against any risks identified. The Group is developing internal

	expertise to manage its ABC Programme. Where required, external expertise is sourced.
Question 30(b)	FirstRand's policy position is that engagements with public officials are treated as higher risk. Subsequent to the completion of FirstRand's enterprise wide ABC risk assessment further enhanced controls may be implemented in this regard.
Question 31:	With amendments to South African ABC laws imminent, a revised ABC risk management plan, against which FirstRand's ABC risk is monitored, has been approved at Group level and will be embedded at a franchise level in due course.
Question 33 a and 34:	The enterprise wide risk assessment is currently in progress,
Question 35:	These risk factors are intended to form part of the ABC risk assessment that is planned.
Question 37:	Third parties are assessed on risk and training only provided if required. All suppliers sign for and are provided with a copy of the ABC Policy and the Supplier Code of Conduct.
Question 37b, c & d and Question 38 & 99 - 102	The Group has developed and rolled out minimum general awareness training relating which is provided to all levels of defence. Targeted training for the various levels of defence is provided on an ad hoc basis and requires improvement.
Question 41:	The financial crime suite of policies and standards are reviewed biennially, unless there is a trigger event prior to the review date (change in legislation, new risk, etc.)
Question 44	A financial crime risk appetite statement has been developed and approved by the Board and key risk indicators have recently been developed. The development of risk tolerances has recently commenced.
Question 47	The Bank is currently completing its inaugural entity wide risk profiling exercise.
Question 48e:	Group wide development has been pipelined and will be rolled out in due course. Rand Merchant Bank, a division of FirstRand Bank Limited, currently performs adverse media checks at the time of onboarding a customer.
Question 49, 49a, 50, 51 and 52:	As the bank transitions into the new risk based approach regime, FirstRand is in the process of completing its AML/CFT enterprise wide risk profiling exercise. This assessment covers sanctions

	risks. The Bank has not developed a separate sanctions risk assessment. Certain sanctions components are addressed in the financial crime risk assessment.
Question 56h:	In terms of Policy and in line with legislative requirements, source of wealth is obtained in respect of PEPs.
Question 57a, 57a1:	UBO information is obtained for high risk clients. The Bank is currently implementing UBO requirements across all categories and risk profiles of clients in accordance with revised legislative requirements introduced by the local regulator (Financial Intelligence Centre). Although reasonable steps are adopted to verify beneficial ownership information, the verification of UBO data remains a challenge in the absence of publicly available registries. There are known data gaps in relation to related party data which is receiving focused attention.
Question 60f:	The Bank has developed bespoke risk models which include an analytical and transactional overlay.
Question 61:	Some franchises conduct adverse media checks at on boarding, whereas others may not- it is risk appetite dependent. All franchises and subsidiaries are expected to conduct adverse media screening when conducting reviews of high risk relationships. A trigger event could include adverse media that arises in respect of a customer- each franchise/subsidiary is required to define its trigger events.
Question 62a and 62c:	Certain areas e.g. the corporate and investment banking division screens clients with a high turnover at on boarding. Bank wide screening of clients against adverse media lists is not implemented. Some franchises/subsidiaries do screen for adverse media in the event of a trigger event arising, whilst others may not- it is dependent on the risk appetite of the franchise concerned.
Question 70 (s):	FirstRand recognises activities related to the cultivation, manufacturing and distribution of Cannabis based products for medicinal and scientific use are deemed sensitive in nature and high-risk due to the associated reputational risk. However, it is important to note these activities are not illegal thus FirstRand

	does not classify them as excluded. Funding is possible subject to an enhanced due diligence through the ESRA processes, which includes a requirement that customers adhere to regional, national, international and industry best practices in this sector. In addition, transactions will be placed on a watch list which will receive ongoing monitoring due to ethical and reputational considerations associated with the nature of the activity.
Question 81c:	FirstRand confirms adherence to the Wolfsberg Transparency Principles for payments as far as is reasonably possible. FirstRand is a SWIFT member, subscribing to the payment message standards as set out in the Wolfsberg Statement on Payment Message Standards relative to MT202/202COV/MT205/205COV since its inception.
Question 89:	Whilst certain business units do screen ultimate beneficial ownership information obtained against relevant sanctions lists at on boarding, there are some business units which currently do not. To this end various projects are in progress to address this coverage gap and ensure that all identified UBOs are screened against relevant sanctions lists.
General:	Each subsidiary and franchise within the Group must ensure that it meets the requirements of the minimum standards as set by the Financial Crime Regulatory Compliance Department. Further to this, each subsidiary and franchise is responsible for disseminating its own policies and procedures, which must align to the Group Standards. To this end, the higher of host or home principle is applicable. From time to time, coverage gaps may emerge, in these instances it is necessary for the respective franchise owner/subsidiary owner to ensure that these coverage gaps are addressed on a prioritised basis. The coverage gaps are tracked and monitored by the respective business unit compliance officers, with oversight from Group Financial Crime Regulatory Compliance.