



Financial Institution Name:

Location (Country) :

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

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/ Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	
13 d	Transactional Banking	
13 e	Investment Banking	
13 f	Financial Markets Trading	
13 g	Securities Services / Custody	
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	
13 j	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	
14 a	If Y, provide the top five countries where the non-resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
15 b	Total Assets	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	
17 c	Trade Finance	
17 d	Payable Through Accounts	
17 e	Stored Value Instruments	
17 f	Cross Border Bulk Cash Delivery	
17 g	Domestic Bulk Cash Delivery	
17 h	International Cash Letter	
17 i	Remote Deposit Capture	
17 j	Virtual /Digital Currencies	
17 k	Low Price Securities	
17 l	Hold Mail	
17 m	Cross Border Remittances	
17 n	Service to walk-in customers (non-account holders)	
17 o	Sponsoring Private ATMs	
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

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	
19 b	Cash Reporting	
19 c	CDD	
19 d	EDD	
19 e	Beneficial Ownership	
19 f	Independent Testing	
19 g	Periodic Review	
19 h	Policies and Procedures	
19 i	Risk Assessment	
19 j	Sanctions	
19 k	PEP Screening	
19 l	Adverse Information Screening	
19 m	Suspicious Activity Reporting	
19 n	Training and Education	
19 o	Transaction Monitoring	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	
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.	

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?	
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
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	
30 b	Includes enhanced requirements regarding interaction with public officials?	
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)?	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	
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?	
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	
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
35 e	Changes in business activities that may materially increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	
37 b	1st Line of Defence	
37 c	2nd Line of Defence	
37 d	3rd Line of Defence	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
37 f	Non-employed workers as appropriate (contractors/consultants)	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

5. AML, CTF & SANCTIONS 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	
40 b	Terrorist financing	
40 c	Sanctions violations	
41	Are the Entity's policies and procedures updated at least annually?	
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	
42 b1	If Y, does the Entity retain a record of the results?	
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
43 d	Prohibit accounts/relationships with shell banks	
43 e	Prohibit dealing with another entity that provides services to shell banks	
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
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	
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
43 i	Define escalation processes for financial crime risk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	
43 m	Outline the processes for the maintenance of internal "watchlists"	
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
45	Does the Entity have a record retention procedures that comply with applicable laws?	
45 a	If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	
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.	

6. AML, CTF & SANCTIONS RISK ASSESSMENT		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	
47 b	Product	
47 c	Channel	
47 d	Geography	
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	
48 b	Customer Due Diligence	
48 c	PEP Identification	
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	
48 f	Training and Education	
48 g	Governance	
48 h	Management Information	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	
50 b	Product	
50 c	Channel	
50 d	Geography	

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	
51 b	Transaction Screening	
51 c	Name Screening	
51 d	List Management	
51 e	Training and Education	
51 f	Governance	
51 g	Management Information	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KYC, CDD and EDD		
54	Does the Entity verify the identity of the customer?	
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	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	
56 b	Customer identification	
56 c	Expected activity	
56 d	Nature of business/employment	
56 e	Product usage	
56 f	Purpose and nature of relationship	
56 g	Source of funds	
56 h	Source of wealth	
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	
57 b	Authorised signatories (where applicable)	
57 c	Key controllers	
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	
59	Does the due diligence process result in customers receiving a risk classification?	

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	
60 b	Geography	
60 c	Business Type/Industry	
60 d	Legal Entity type	
60 e	Adverse Information	
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	
62	If Y, is this at:	
62 a	Onboarding	
62 b	KYC renewal	
62 c	Trigger event	
63	What is the method used by the Entity to screen for adverse media / negative news?	
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?	
65	If Y, is this at:	
65 a	Onboarding	
65 b	KYC renewal	
65 c	Trigger event	
66	What is the method used by the Entity to screen PEPs?	
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?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	

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	
70 b	Non-resident customers	
70 c	Shell banks	
70 d	MVTS/ MSB customers	
70 e	PEPs	
70 f	PEP Related	
70 g	PEP Close Associate	
70 h	Correspondent Banks	
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
70 i	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 l	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
70 s	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
70 v	Other (specify)	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
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.	

8. MONITORING & REPORTING		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report suspicious transactions?	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	
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?	
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	
81 b	Local Regulations	
81 b1	Specify the regulation	
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	
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.	

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?	
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)?	
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?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
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?	
92	What is the method used by the Entity?	
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	
93 e	Lists maintained by other G7 member countries	
93 f	Other (specify)	
94	Question removed	
95	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:	
95 a	Customer Data	
95 b	Transactions	

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?	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

11. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
98 e	Conduct and Culture	
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	
99 b	1st Line of Defence	
99 c	2nd Line of Defence	
99 d	3rd Line of Defence	
99 e	3rd parties to which specific FCC activities have been outsourced	
99 f	Non-employed workers (contractors/consultants)	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	
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.	

12. QUALITY ASSURANCE /COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	
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?	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	
107 b	External Third Party	
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	
108 c	Transaction Monitoring	
108 d	Transaction Screening including for sanctions	
108 e	Name Screening & List Management	
108 f	Training & Education	
108 g	Technology	
108 h	Governance	
108 i	Reporting/Metrics & Management Information	
108 j	Suspicious Activity Filing	
108 k	Enterprise Wide Risk Assessment	
108 l	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
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.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

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)

_____ (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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, _____ (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.

I, _____ (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 the Financial Institution.

 _____ (Signature & Date) 13 September 2022

 _____ (Signature & Date) 12 September 2022



FirstRand

Annexure to FirstRand Bank Limited Wolfsberg Questionnaire: Additional Clarifying Note

CBDDQ No:	Clarifying note:
17 a6	Nested/Downstream clearing
	<p>Initially the nested activity was for FirstRand subsidiaries who do not have sufficient volumes to hold their own vostro accounts as this would not make business sense. For example, our operations in Lesotho. The regional downstream-clearing pilot programme is in USD with CITI and anticipated to be in Pound Sterling with another counterparty in London.</p> <p>The African Gateway regional clearing service offers a holistic clearing capability to banks operating outside South Africa which combines our domestic clearing capabilities in ZAR through Rand Account services (ZAR Clearing) offering, our country domestic clearing capabilities in the Rest of Africa (Africa Subs Local Currency clearing) and finally the ability to clear USD, EUR and GBP on behalf of smaller banks in Africa which is only 4 banks currently (Foreign Currency Clearing Services) , using FirstRand's current partnership model with trusted global banking partners in foreign currency.</p> <p>Key Controls of the Gateway Payments/Regional Clearing are:</p> <ul style="list-style-type: none">• Compliance requirements: CDD & EDD Review, Country Risk assessment, In-country Visits, Transaction Monitoring, KYCC Assessment, Policy reviews, Ongoing periodic reviews• Excluded Activities & Sensitive Industry Matrix Review: Desirability review, identification and assessment of direct links/exposure by the Respondent Banks against our Sensitive Industry Matrix.• Audit Attestation: Verification of controls via a letter from the banks external auditors to confirm the adequacy of AML/CFT controls.• Business Case Motivation: Approval by FirstRand's Governance Committee.• Counter-part Bank Clearance by Nostro Provider: The Bank's selection criteria must be in line with Nostro provider's jurisdictional risk appetite and existing client relationships to FirstRand.
17 d	Payable Through Accounts

CBDDQ No:	Clarifying note:
	<p>Payable through Accounts are allowed by FirstRand in respect of the ZAR (vostro accounts), only by the subsidiaries or branches of the account holder. The account holder will provide us with a debit authority for the specific subsidiaries and branches. The debit authorities are reviewed on an annual basis and re-confirmed with the accountholder. In addition, the completion of a specific due diligence questionnaire on payable through accounts is obtained from the accountholders, which is reconfirmed on an annual basis.</p> <p>Payable through pertains to certain clients that are using our ZAR services where they allow their ZAR account to be used for payable through transactions – we apply enhanced due diligence on these clients and accounts. Therefore, our Nostro accounts would not be affected by these arrangements</p> <p>Enhanced due diligence is performed in respect of the respondent banks in order to satisfy ourselves that the bank has adequate AML/CFT controls in place to perform ongoing due diligence on its underlying customers. Each respondent bank is also subjected to our internal risk model which takes into account various risk factors.</p> <p>FirstRand may, as and when required, request the respondent bank to provide relevant client due diligence data of the underlying affiliates should there be a requirement to verify or confirm certain information.</p>
17 j	<p>Virtual/Digital Currencies</p>
	<p>FirstRand has limited exposure to Virtual Currency providers and exchanges. FirstRand has previously made an appetite decision to only offer operational bank accounts to VC providers and exchanges, in respect of salary and operational payments. Monitoring is in place for customers or entities buying or selling VCs in the normal course of business, in respect of financial crime and Excon.</p>
70 r	<p>Marijuana</p>
	<p>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.</p> <p>It is important to clarify the FirstRand position on marijuana is specific to cannabis based and related products for medicinal and scientific use, restricting potential finance to commercial transactions.</p> <p>Note the restrictions on this financing was primarily based on concerns around supply chain oversight and the lack of control over the final destination of products, it was decided this presents a substantial risk to FSR. These restrictions are not based on the legalities as this sector is adequately regulated by the Medical Control Council predominantly through the Medicines and Related Substances Act (1965).</p>
70 t	<p>Gambling</p>
	<p>Gambling, Licensed gambling companies and others. Refers to casinos (excludes on-line gambling) transactions will be placed on a watch list which will receive ongoing monitoring for such.</p> <p>The nature of the gaming/gambling industry is inherently high risk for money-laundering (“ML”) and terrorist financing (“TF”). FirstRand risk appetite for conducting business with entities operating in this sector requires the residual risk to be medium after the consideration of appropriate controls implemented to manage the risk.</p> <p>Relationships with unregulated/unregistered gambling entities is prohibited. As licensing and regulation of gambling entities may differ from jurisdiction to jurisdiction, each subsidiary of Firstrand must align with local legislative structures of gambling entities however these may be defined for each country.</p>

CBDDQ No:	Clarifying note:
70 o	Adult Entertainment/Red Light Business
	<p>FirstRand will not finance clients where funds will be used for any purpose related to pornographic activity. For purposes of this position statement, pornography is understood to be sexually explicit material (verbal or pictorial) or erotic material that is primarily designed to produce sexual arousal in viewers. It is important to distinguish here between sexually explicit material that is wholly or primarily designed to produce sexual arousal (i.e., whose only or overriding aim is to produce sexual arousal) and material whose aim is to do this to make some other artistic or political point. Pornographic activity may use a variety of media including books, magazines, postcards, photos, sculpture, drawing, painting, animation, sound recording, film, video and video games.</p>
70 j	Atomic Power' industry customers
	<p>FirstRand has identified the arms/defence industry as high-risk with regards to credit risk, reputational risk, sanctions risk and anti-bribery and corruption, which requires specific policy positioning. Every application related to weapons, ammunition, defensive and protective clothing or any other equipment that can be linked to the arms industry, is subjected to an enhanced due diligence (ESRA) process.</p> <p>FirstRand will not provide financial services or financial products to industries involved in the development, manufacturing, maintenance, stockpiling, transfer, use, testing and production of, or trade in nuclear, chemical, biological or other weapons of mass destruction, landmines, cluster bombs (including cluster munitions in violation of the international convention on cluster munitions) or any equipment designed to be used as an instrument of torture and/or the delivery systems of such instruments</p>
70 k	Extractive Industries
	<p>The mining of conflict minerals, their trade and secondary resale of products/materials which contain conflict minerals, harbour extreme negative social injustice as well as facilitate war and organised crime The term “conflict minerals” refers to minerals mined or extracted in zones declared as conflict zones with the aim to perpetuate political unrest, fighting and war. Minerals include blood diamonds, cassiterite, wolframite, coltan, gold ore and even petroleum. FirstRand will not finance clients who are involved in the mining, manufacture and trading of conflict minerals. FirstRand will also look to the following industry best practices, guidelines and bodies to determine effective responses to risks faced by clients, as appropriate for the related minerals and metals:</p> <ul style="list-style-type: none"> • World Gold Council's Conflict Free Gold Standard; • Kimberly Process Certification Scheme. • Extractive Industries Transparency Initiative (EITI). • International Council on Mining and Metals (ICMM) Best Practices. • Responsible Jewellery Council. • LBMA's Guidance for Responsible Gold; and • Voluntary Principles for Security and Human Rights
70 d	MVTS/ MSB customers
	<p>MoneyGram is a product which is available to valid FNB account holders only. FNB apply very strict anti-money laundering and security procedures ensuring that customers' money is safely and securely transferred. FNB customers use MoneyGram to send money for two reasons:</p> <ul style="list-style-type: none"> • Gifts (BoP code 401). South African residents and Foreign National can send money via MoneyGram as a GIFT to a beneficiary in another country. • Salary (BoP code 417). Foreign Nationals, like migrant workers may send a portion of their salary to beneficiaries in other countries. This option is not allowed for SA Residents. <p>We have a total of 15 Money Service Business on our books, however only 8 of these are actively trading, below is the business status:</p>

CBDDQ No:	Clarifying note:
	<ul style="list-style-type: none">• MoneyGram is a payment rail which the bank is integrated to via APIs to conduct Send & Receive transactions. This rail is solely for the actual transactions which take place daily to settle between Sender & Receiver and is separate from the settlement which takes place between FNB & MoneyGram.
45 a	<ul style="list-style-type: none">• The record retention period for FirstRand is 7 years.
95a	<ul style="list-style-type: none">• For clarification, FirstRand updates Customer screening systems the same day or the next day and not 2 business days later. This is not an option on the dropdown list.
95b	<ul style="list-style-type: none">• For clarification, FirstRand updates Transactional screening systems the same day or the next day and not 2 business days later. This is not an option on the dropdown list.