

the Wolfsberg Group

Financial Institution Name:
Location (Country):

Anadolubank Nederland N.V.
Netherlands

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Anadolubank Nederland N.V
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Anadolubank Nederland N.V does not have foreign branches
3	Full Legal (Registered) Address	Da Boelelaan 7, Officia 1, 1083 HJ Amsterdam
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	05/04/2006
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No <input checked="" type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No <input type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input checked="" type="checkbox"/>
6 d	Privately Owned	Yes <input checked="" type="checkbox"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Mehmet Rustu Basaran
7	% of the Entity's total shares composed of bearer shares	N/A
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No <input type="checkbox"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No <input type="checkbox"/>
10	Provide Legal Entity Identifier (LEI) if available	724500ZNT2I60RYZQI38
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes <input type="checkbox"/>
11 b	Adverse Information Screening	Yes <input checked="" type="checkbox"/>
11 c	Beneficial Ownership	Yes <input checked="" type="checkbox"/>
11 d	Cash Reporting	Not Applicable <input type="checkbox"/>
11 e	CDD	Yes <input checked="" type="checkbox"/>
11 f	EDD	Yes <input checked="" type="checkbox"/>


11 g	Independent Testing	Yes	<input type="checkbox"/>
11 h	Periodic Review	Yes	<input checked="" type="checkbox"/>
11 i	Policies and Procedures	Yes	<input checked="" type="checkbox"/>
11 j	PEP Screening	Yes	<input checked="" type="checkbox"/>
11 k	Risk Assessment	Yes	<input checked="" type="checkbox"/>
11 l	Sanctions	Yes	<input checked="" type="checkbox"/>
11 m	Suspicious Activity Reporting	Yes	<input checked="" type="checkbox"/>
11 n	Training and Education	Yes	<input checked="" type="checkbox"/>
11 o	Transaction Monitoring	Yes	<input checked="" type="checkbox"/>
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes	<input type="checkbox"/>
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	<input type="checkbox"/>
13 a	If Y, provide further details		
14	Does the entity have a whistleblower policy?	Yes	<input type="checkbox"/>
3. ANTI BRIBERY & CORRUPTION			
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	<input type="checkbox"/>
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="checkbox"/>
17	Does the Entity provide mandatory ABC training to:		
17 a	Board and Senior Committee Management	Yes	<input type="checkbox"/>
17 b	1st Line of Defence	Yes	<input checked="" type="checkbox"/>
17 c	2nd Line of Defence	Yes	<input type="checkbox"/>
17 d	3rd Line of Defence	Yes	<input type="checkbox"/>
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not applicable	<input type="checkbox"/>
17 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	<input type="checkbox"/>
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
18 a	Money laundering	Yes	<input checked="" type="checkbox"/>
18 b	Terrorist financing	Yes	<input type="checkbox"/>
18 c	Sanctions violations	Yes	<input checked="" type="checkbox"/>
19	Does the Entity have policies and procedures that:		
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="checkbox"/>
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<input type="checkbox"/>
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="checkbox"/>
19 d	Prohibit accounts/relationships with shell banks	Yes	<input type="checkbox"/>
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	<input type="checkbox"/>
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="checkbox"/>
19 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	Please select	
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="checkbox"/>
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	<input type="checkbox"/>
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	<input type="checkbox"/>

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20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="checkbox"/>
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	<input type="checkbox"/>
21 a	If Y, what is the retention period?	5 years or more	<input type="checkbox"/>
5. KYC, CDD and EDD			
22	Does the Entity verify the identity of the customer?	Yes	<input type="checkbox"/>
23	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	<input type="checkbox"/>
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	<input checked="" type="checkbox"/>
24 b	Expected activity	Yes	<input type="checkbox"/>
24 c	Nature of business/employment	Yes	<input checked="" type="checkbox"/>
24 d	Ownership structure	Yes	<input type="checkbox"/>
24 e	Product usage	Yes	<input checked="" type="checkbox"/>
24 f	Purpose and nature of relationship	Yes	<input checked="" type="checkbox"/>
24 g	Source of funds	Yes	<input type="checkbox"/>
24 h	Source of wealth	Yes	<input type="checkbox"/>
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	<input type="checkbox"/>
25 a1	Are ultimate beneficial owners verified?	Yes	<input type="checkbox"/>
25 b	Authorised signatories (where applicable)	Yes	<input type="checkbox"/>
25 c	Key controllers	Yes	<input type="checkbox"/>
25 d	Other relevant parties	Yes	<input type="checkbox"/>
26	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="checkbox"/>
27	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	<input type="checkbox"/>
28	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	<input type="checkbox"/>
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	<input type="checkbox"/>
29 a	If yes, select all that apply:		
29 a1	Less than one year	Yes	<input type="checkbox"/>
29 a2	1 – 2 years	Yes	<input type="checkbox"/>
29 a3	3 – 4 years	Yes	<input type="checkbox"/>
29 a4	5 years or more	Yes	<input type="checkbox"/>
29 a5	Trigger-based or perpetual monitoring reviews	Yes	<input checked="" type="checkbox"/>
29 a6	Other (please specify)		
30	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?		
30 a	Arms, Defence, Military	Prohibited	<input type="checkbox"/>
30 b	Correspondent Banks	Prohibited	<input type="checkbox"/>
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	<input type="checkbox"/>
30 c	Embassies/Consulates	EDD on risk-based approach	<input checked="" type="checkbox"/>
30 d	Extractive industries	EDD on risk-based approach	<input checked="" type="checkbox"/>
30 e	Gambling customers	Prohibited	<input checked="" type="checkbox"/>
30 f	General Trading Companies	No EDD/restriction or prohibition	<input checked="" type="checkbox"/>
30 g	Marijuana-related Entities	Prohibited	<input checked="" type="checkbox"/>
30 h	MSB/MVTS customers	Prohibited	<input checked="" type="checkbox"/>
30 i	Non-account customers	EDD on risk-based approach	<input checked="" type="checkbox"/>
30 j	Non-Government Organisations	Prohibited	<input checked="" type="checkbox"/>
30 k	Non-resident customers	EDD on risk-based approach	<input checked="" type="checkbox"/>

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30 l	Nuclear power	Prohibited	<input type="checkbox"/>
30 m	Payment Service Provider	Prohibited	<input type="checkbox"/>
30 n	PEPs	EDD on risk-based approach	<input type="checkbox"/>
30 o	PEP Close Associates	EDD on risk-based approach	<input type="checkbox"/>
30 p	PEP Related	EDD on risk-based approach	<input type="checkbox"/>
30 q	Precious metals and stones	EDD on risk-based approach	<input type="checkbox"/>
30 r	Red light businesses/Adult entertainment	Prohibited	<input type="checkbox"/>
30 s	Regulated charities	No EDD/restriction or prohibition	<input type="checkbox"/>
30 t	Shell banks	Prohibited	<input type="checkbox"/>
30 u	Travel and Tour Companies	EDD on risk-based approach	<input type="checkbox"/>
30 v	Unregulated charities	Prohibited	<input type="checkbox"/>
30 w	Used Car Dealers	Prohibited	<input type="checkbox"/>
30 x	Virtual Asset Service Providers	Prohibited	<input type="checkbox"/>
30 y	Other (specify)		
31	If restricted, provide details of the restriction		
6. MONITORING & REPORTING			
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	<input type="checkbox"/>
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	<input type="checkbox"/>
33 a	If manual or combination selected, specify what type of transactions are monitored manually	All transactions are approved by account officers because the transactions are initiated by e-mail, letter or fax; where needed payment orders are escalated to Compliance for pre-approval. In addition AB has both a pre- and post transaction monitoring program in place; alerts are handled by 2nd line of defence.	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	<input type="checkbox"/>
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	<input type="checkbox"/>
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	<input type="checkbox"/>
7. PAYMENT TRANSPARENCY			
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	<input type="checkbox"/>
37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	<input type="checkbox"/>
37 b	Local Regulations	Yes	<input type="checkbox"/>
37 b1	If Y, Specify the regulation	Funds Transfer Regulation (EU)2015/847 Payment Service Directive	
37 c	If N, explain		
8. SANCTIONS			
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes	<input type="checkbox"/>
39	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	<input type="checkbox"/>

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactions	
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactions	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactions	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactions	
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactions	
41 f	Other (specify)	List of sanctioned individuals, groups, and entities issued by Dutch Government	
42	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	
9. TRAINING & EDUCATION			
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence	Yes	
44 c	2nd Line of Defence	Yes	
44 d	3rd Line of Defence	Yes	
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	
44 f	Non-employed workers (contractors/consultants)	Yes	
10. AUDIT			
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes	
Signature Page			
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_____ (Financial Institution name)			
I, <u>A. J. OTTEN</u> (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.			
 _____ (Signature & Date) <u>20-02-2023</u>			