the Wolfsberg Group

Financial Institution Name: Belfius Bank SA/NV
Location (Country): Belgium

The questionnairs 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	
1. ENTITY	& OWNERSHIP	Answer
1	Full Legal Name	
	Legal Maille	Belflus Bank SA/NV
2	Append a list of foreign branches which are covered	
	by this questionnaire	N/A
3	Full Legal (Registered) Address	
	- G (- 1-3-1-1-7) / 12-01-03-3	Place Rogier 11 - 1210 Brussels - Belgium
4		
4	Full Primary Business Address (if different from	
	above)	
		†
5	Date of Entity incorporation/establishment	
	,paramonomoniioni	23/10/1962
Į		
6	0-1	
1	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
1	symbol	
1		
6 b	Member Owned/Mutual	
6 c		No
6 d	Government or State Owned by 25% or more	Yes
6 d1	Privately Owned	No
601	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
i		
7	% of the Entity's total shares composed of bearer	
į,	shares	none
		none
3	Dono the Endt.	
,]	Does the Entity, or any of its branches, operate under	No
	an Offshore Banking License (OBL)?	
a	If Y, provide the name of the relevant branch/es	
1	which operate under an OBL	
l		
- 1	j	
- 	Does the Bank have a Virtual Bank License or	
[.	provide services only through online channels?	No
0 1	ame of primary financial or and death and	
- I.	Name of primary financial regulator/supervisory authority	European Central Bank - National Bank of Belgium - Financial Services and Markets Authority
ľ	a unionity	(Belgium) - (Central Bank of Ireland for the bank's Irish subsidiary)
		· · · · · · · · · · · · · · · · · · ·
1 F	Provide Legal Entity Identifier (LEI) if available	
	, ,	A5GWLFH3KM7YV2SFQL84
1		
	1	
2 F	Provide the 4 II had	
- 15	Provide the full legal name of the ultimate parent (if	N/A
l a	ifferent from the Entity completing the DDQ)	••••
1		

13	Jurisdiction of licensing authority and regulator of	N/A
	ultimate parent	NO.
	e il a e e	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h ,	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	
144 N	Oniei (piease explain)	
	i l	
15	Does the Entity have a significant (10% or more)	
	portfollo of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
i	Tringle built services are provided,	
15 a	If Y, provide the top five countries where the non-	
l <u></u>	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	5001-10000
16 b	Total Assets	Greater than \$500 million
	Confirm that all responses provided in the above	Oreate: then \$600 mines;
17	Section are representative of all the LE's branches.	Yes
47 -	If N, clarify which questions the difference/s relate to	
17 a	tire, ciainy temon quodudito die americinese relete to	
' a	and the branch/es that this applies to.	
1 / B		
1 / B.		
	and the branch/es that this applies to.	
17 a	and the branch/es that this applies to. If appropriate, provide any additional	Q6c: The share capital is represented by 359.412,516 registered shares. 359,407,616 registered
	and the branch/es that this applies to.	shares are held by the public limited company of public interest Federal Holding and Investment
	and the branch/es that this applies to. If appropriate, provide any additional	shares are held by the public limited company of public interest Federal Holding and Investment Company (FHIC), in its own name, but on behalf of the Belgian State, and 5,000 registered shares
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18	and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	shares are held by the public limited company of public interest Federal Holding and Investment Company (FHIC), in its own name, but on behalf of the Belgian State, and 5,000 registered shares
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19 a1i	Does the Entity have processes and procedures	
1	in place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	Tes
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	Yes
19 f		No
	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19	Payment services to non-bank entities who may	
	then offer third party payment services to their	No
	customers?	
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 14	eCommerce Platforms	No
19 i5	Other - Please explain	110
	· · · · · · · · · · · · · · · · ·	
19 j	Private Poekie-	
	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	•
19 p1	Check cashing service	No .
19 p1a	If yes, state the applicable level of due diligence	No due diligence (Not required)
19 p2	Wire transfers	No due diligence (Not required)
19 p2a	If yes, state the applicable level of due diligence	No due diligence (Not required)
19 p3	Foreign currency conversion	No due diagende (Not required)
19 p3a	If yes, state the applicable level of due diligence	No due diligence (Not required)
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	No due diligence (Not required)
19 p5	If you offer other services to walk-in customers	No due diligence (Not required)
•	please provide more detail here, including	
	describing the level of due diligence.	
19 q	Other blah dalamata	
134	Other high-risk products and services identified by the Entity (please specify)	
	the Littity (please specify)	
20	Confirm that all responses provided in the above	
_	Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
21	If appropriate, provide any additional	
	information/context to the answers in this section.	Q19a1 - A limited number (4) of historical client relationships with Belgium registered and licensed,
	and the second to the distriction of the second it.	money service businesses exists. This type of entities fall within an Enhanced Due Diligence
		assessment,
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the	
	following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 g 22 h	1	Yes
	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
12.1	Sanctions	Yes
22	Sanctons	res

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
2 2 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, sof citation or receiving of anything of value, directly or indirectly, if improperly intended to influence act on or obtain an advantage.	Yes
35 b	includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessmen (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yas
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

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foreign PEPs, including their family and close Yes	foreign PEPs, including their family and close		h	foreign PEPs, including their family and close	Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49]	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PFPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
S AMI CTE	& SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the	<u> </u>
1		
54 a	inherent risk components detailed below:	Yes
54 a 54 b	inherent risk components detailed below:	Yes Yes
54 a 54 b 54 c	inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes
54 a 54 b 54 c 54 d	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 a 54 b 54 c 54 d 55	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes Yes
54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 b 55 c 55 b 55 c 55 d 55 e 55 f 55 g	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 554 b 554 c 554 d 555 c 55 d 55 c 55 d 55 g 55 h	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 5	inherent risk components detailed below: Client Product Channel Geography Does the Enitiy's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Enitiy's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Enitity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 b 54 c 54 d 55	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 d 5	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Treining and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c 54 d 55 5 c 55 d 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 55 c 55 a 55 c 55 d 55 c 57 d 57 a 57 c 57 d 57 c 57 d	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Ditigence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c 54 d 55 5 c 55 d 55 c 57 c 57	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 b 54 c 54 c 55 c 55 c 55 c 55 c 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 b 54 c 54 c 55 c 55 c 55 c 55 c 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Ditigence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Ditigence Governance	Yes
54 a 54 b 54 c 54 d 55 55 c 55 a 55 c 55 d 55 c 57 d 57 a 57 c 57 d 57 c 57 d	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Ditigence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c 54 c 55 c 55 c 55 c 55 c 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 a 54 b 54 c 54 c 55 c 55 c 55 c 55 c 55 c	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

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58 e	I Nama Sanaula	
58 f	Name Screening Transaction Screening	Yes
58 g		Yes
59 59	Training and Education	Yes
-	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a		
JJ a	If N, provide the date when the last Sanctions EWRA was completed.	
	ETTICA was completed.	V
60	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes .
60 a	If N, clarify which questions the difference/s relate to	
1	and the branch/es that this applies to.	
,		
61	If appropriate, provide any additional	
	information/context to the answers in this section.	
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	I V
63	Do the Entity's policies and procedures set out when	Yes
	CDD must be completed, e.g. at the time of	V
	onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and	
	rotain when conducting CDD? Select all that apply:	
64 a	Customer identification	V
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
84 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	Yes
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	Yes
35 b	Authorised signatories (where applicable)	Yes
35 c	Key controllers	Yes
35 d	Other relevant parties	Yes
36	What is the Entity's minimum (lowest) threshold	No
	applied to beneficial ownership identification?	25%
37	Does the due diligence process result in customers	
"	receiving a risk classification?	Yes
37 a	<u> </u>	
	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
7 a1	Product Usage	
7 a2	Geography	Yes
7 a3	Business Type/Industry	Yes
7 a4	Legal Entity type	Yes
7 a5	Adverse Information	Yes
7 a6	Other (specify)	Yes
	omor (apacity)	Screening results (a.o. PEP, Sanctions,)
		•
8	For high right new individual	
•	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
8 a	If Y, is this at:	**************************************
	1 R 1. IS UUS MU	-
8 a1	Onboarding	Yes
8 a1 8 a2	Onboarding KYC renewal	No
8 a1 8 a2 8 a3	Onboarding KYC renewal Trigger event	No No
8 a1 8 a2 8 a3 8 a4	Onboarding KYC renewal Trigger event Other	No
8 a1 8 a2 8 a3	Onboarding KYC renewal Trigger event	No No
8 a1 8 a2 8 a3 8 a4	Onboarding KYC renewal Trigger event Other	No No
8 a1 8 a2 8 a3 8 a4	Onboarding KYC renewal Trigger event Other	No No
8 a1 8 a2 8 a3 8 a4 8 a4a	Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	No No
8 a1 8 a2 8 a3 8 a4	Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	No No
8 a1 8 a2 8 a3 8 a4 8 a4a	Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative	No No
8 a1 8 a2 8 a3 8 a4 8 a4 8 a4a	Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	No No No
8 a1 8 a2 8 a3 8 a4 8 a4 8 a4a	Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	No No No
8 a1 8 a2 8 a3 8 a4 8 a4 8 a4a	Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	No No No

69 a3	Trigger event	Yes
70	Trigger event What is the method used by the Entity to screen for	195
_	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:)
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Restricted
76 b	Respondent Banks	Restricted
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Restricted
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Restricted
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entities	Always subject to EDD
76 h	MSB/MVTS customers	Restricted
76 i	Non-account customers	Prohibited
76]	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	Always subject to EDD
76 I	Nuclear power	Always subject to EDD
76 m	Payment Service Providers	Restricted
76 n	PEPs	
		Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Restricted
76 r	Red light businesses/Adult entertainment	Restricted
76 s	Regulated charities	Always subject to EDO
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Always subject to EDD
76 v	Unregulated charitles	Prohibited
76 w	Used Car Dealers	Always subject to EDD
76 x	Virtual Asset Service Providers	Always subject to EDD
76 y	Other (specify)	
77	If restricted, provide details of the restriction	Certain restrictions exist in internal policies re aled to 'Environment Social Governance' and/or specific type of entities such as Financial Institutions.
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	1
79	Does the Entity have specific procedures for	Both
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	·
82		Q76 - As one of the systematically important Belgian financial institutions. Belfius Bank SA can be obligated by law to provide, under certain conditions, a basic banking service to each business that is established in Belgium. These are always subjected to the most stringent Due Dilligence. Furthermore, de-risking legislations prohibits us to exclude any lawful category of
B. MONIT	ORING & REPORTING	T CUSTOMICISTICUSCIES Unreservediv.
33	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
34	What is the mothod used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
34 a	If manual or combination selected, specify what type of transactions are monitored manually	Transaction executed at the counter, executed by Bank employees and/or manual pre-screening before introduction.
34 Ь	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
14 b1	If Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	FISERV/FCRM
4 b2	When was the tool last updated?	<1 year
4 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
15	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
5 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
6	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
B	Opes the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
)	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
)	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
) a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
· · · ·	If appropriate, provide any additional nformation/context to the answers in this section.	
PAYME	NT TRANSPARENCY	
· ATIBE	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	:
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	European Regulation (EU) 2015/847 on information accompanying transfers of funds + Fourth AML/CFT directive 2015/849 of 20 May 2015 (transposed into Belgian law by the Law of 18 September 2017) as modified by the fifth AML/CFT Directive 2018/843 of 30 May 2018 (transposed into Belgian Law by the Law of 20 July 2020)
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes .
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at for	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	if 'autometed' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a vendor-sourced tool or 'bolt' selected, what is the name of the vendor/tool?	FISERV/FCRM for client screening FIRCOSOFT for transaction screening TRADE All for additional ex-ante screening of Trade Finance transactions
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If Other please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Death Fill	
103	Does the Entity have a data quality management programme to ensure that complete data for all	
1	transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office o	
106 с	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
100 6	Office of Financial Sanctions Implementation HMT (OFSI)	Ligad for agreeing
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Not used
		National Sanctions List of Belgium
		•
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the	
	entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	
107 b	Transactions	Same day to 2 business days
108		Same day to 2 business days
	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices	
	located in countries/regions against which UN OFAC	No
	OFSI, EU or G7 member countries have enacted	
400	comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N. clarify which guarantees the diff	
,,,,	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and and and applies to.	
110	If appropriate, provide any additional	
	information/context to the answers in this section.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a		
	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant	
	for the types of products and services offered	Yes
11 c	Internal policies for controlling money laundering,	Yes
11 d	terrorist financing and sanctions violations New issues that occur in the market, e.g. significant	165
	regulatory actions or new regulations	Yes
11 e	Conduct and Culture	Voo
11 f	Fraud	Yes Yes
12	Is the above mandatory training provided to:	Harris National Angles (New Yorks) (New Yorks) (New Yorks) (New Yorks)
12 a	Board and Senior Committee Management	Yes
12 b	1st Line of Defence	Yes
12 c	2nd Line of Defence	Yes
12 d	3rd Line of Defence	Yes
12 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
12 f	Non-employed workers (contractors/consultants)	
13	Does the Entity provide AML, CTF & Sanctions training	No
	The same bridge provide Awit, OTE & Sanctions training	
	that is targeted to specific roles, responsibilities and	Vos.
	that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
14	that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML.	
	that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes Yes
14 a	that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered?	
	that is targeted to specific roles, responsibilities and high-risk products, services and activities? Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered? Confirm that all responses provided in the above	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
		:
	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	18 months
122 b	External Third Party	Component-based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	Q122a: normally, every 3 years. In practice, this can be more often due to external requirements
14. FRAU 127	Does the Entity have policies in place addressing	Yes
128	fraud risk? Does the Entity have a dedicated team responsible	
	for preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Anti- Money Belfius Bar	nk SA/NV (Financial Institutii to romain in full compliance with all applicable financial crime laws	ing or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Crimes Compliance OR equivalent) on name) is fully committed to the fight against financial crime and makes , regulations and standards in all of the jurisdictions in which it does business and holds accounts.
-		e and sustainable controls to combat financial crime in order to protect its reputation and to meet its
ine Financi standards.	al Institution recognises the importance of transparency regarding	parties to transactions in international payments and has adopted/is committed to adopting these
The Financi The informa	al Institution further certifles it complies with / is working to comply tion provided in this Wolfsberg CBDDQ will be kept current and w	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. ill be updated no less frequently than every eighteen months.
The Financi	al Institution commits to file accurate supplemental information on	a timely basis.
	rendeets (Global Head of provided in this Wolfsberg CBDDQ are complete and correct to	Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
Luc Lev		ralent), certify that I have read and understood this declaration, that the answers provided in this mauthorised to execute this declaration on behalf of the Financial Institution.
Koen Viere	ondeels C.C. Toblu 6th 22 (Signature a Date	Herendrech)