



Financial Institution Name:
Location (Country) :

Belfius Bank NV/SA
Belgium

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

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Belfius Bank SA/NV
2	Append a list of foreign branches which are covered by this questionnaire	N/A
3	Full Legal (Registered) Address	Place Rogier 11 - 1210 Brussels - Belgium
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	23/10/1962
6	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 symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
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	None
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	European Central Bank - National Bank of Belgium - Financial Services and Markets Authority (Belgium) - (Central Bank of Ireland for the bank's Irish subsidiary).
11	Provide Legal Entity Identifier (LEI) if available	A5GWLH3KM7YV2SFQL84
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

13	Jurisdiction of licensing authority and regulator of ultimate parent	
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)	
15	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)	No ☐
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	5001-10000 ☐
16 b	Total Assets	Greater than \$500 million ☐
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes ☐
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	Q8c: The share capital is represented by 359,412,616 registered shares. All shares of Belfius Bank are held by the public limited company of public interest Federal Holding and Investment Company (SFPIIM). 359,407,616 registered shares are held by the company under delegated mandate on behalf of the Belgian State, and 5,000 registered shares are held by the company acting on
2. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes ☐
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes ☐
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No ☐
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes ☐
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes ☐
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No ☐
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes ☐
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Yes ☐
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No ☐
19 a1h2	MVTs	No ☐
19 a1h3	PSPs	No ☐

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Yes	
19 b	Cross-Border Bulk Cash Delivery	No	
19 c	Cross-Border Remittances	Yes	
19 d	Domestic Bulk Cash Delivery	Yes	
19 e	Hold Mail	No	
19 f	International Cash Letter	Yes	
19 g	Low Price Securities	No	
19 h	Payable Through Accounts	No	
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes	
19 i1	If Y , please select all that apply below?		
19 i2	Third Party Payment Service Providers	Yes	
19 i3	Virtual Asset Service Providers (VASPs)	No	
19 i4	eCommerce Platforms	Yes	
19 i5	Other - Please explain		
19 j	Private Banking	Domestic	
19 k	Remote Deposit Capture (RDC)	No	
19 l	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	
19 p2a	If yes, state the applicable level of due diligence	No due diligence (Not required)	
19 p3	Foreign currency conversion	No	
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 please provide more detail here, including describing the level of due diligence.		
19 q	Other high-risk products and services identified by the Entity (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 of historical client relationship with Belgium registered and licensed, money service businesses exists. This type of entities fall within an Enhance Due Diligence assessment.	
3. AML, CTF & SANCTIONS PROGRAMME			
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		
22 a	Appointed Officer with sufficient experience/expertise	Yes	
22 b	Adverse Information Screening	Yes	
22 c	Beneficial Ownership	Yes	
22 d	Cash Reporting	Yes	
22 e	CDD	Yes	
22 f	EDD	Yes	
22 g	Independent Testing	Yes	
22 h	Periodic Review	Yes	
22 i	Policies and Procedures	Yes	
22 j	PEP Screening	Yes	
22 k	Risk Assessment	Yes	
22 l	Sanctions	Yes	

22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	
22 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, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	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?	Yes	
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	

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	v
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	v
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	v
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	v
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	v
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	v
42 b	1st Line of Defence	Yes	v
42 c	2nd Line of Defence	Yes	v
42 d	3rd Line of Defence	Yes	v
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	v
42 f	Non-employed workers as appropriate (contractors/consultants)	No	v
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	v
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.		
5. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	v
46 b	Terrorist financing	Yes	v
46 c	Sanctions violations	Yes	v
47	Are the Entity's policies and procedures updated at least annually?	Yes	v
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	No	v
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable	v
48 b	EU Standards	Yes	v
48 b1	If Y, does the Entity retain a record of the results?	Yes	v
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	v
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	v
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	v
49 d	Prohibit accounts/relationships with shell banks	Yes	v
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	v
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	v
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	v
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	v

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	v
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	v
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	v
49 l	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	v
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	v
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	v
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	v
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	v
51 a	If Y, what is the retention period?	5 years or more	v
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v
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.		
6. AML, CTF & SANCTIONS RISK ASSESSMENT			
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	v
54 b	Product	Yes	v
54 c	Channel	Yes	v
54 d	Geography	Yes	v
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	v
55 b	Customer Due Diligence	Yes	v
55 c	PEP Identification	Yes	v
55 d	Transaction Screening	Yes	v
55 e	Name Screening against Adverse Media/Negative News	Yes	v
55 f	Training and Education	Yes	v
55 g	Governance	Yes	v
55 h	Management Information	Yes	v
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	v
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	v
57 b	Product	Yes	v
57 c	Channel	Yes	v
57 d	Geography	Yes	v
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	v
58 b	Governance	Yes	v
58 c	List Management	Yes	v
58 d	Management Information	Yes	v

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

69 a3	Trigger event	Yes	v
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual	v
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	v
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	v
71 a2	KYC renewal	Yes	v
71 a3	Trigger event	Yes	v
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	v
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	v
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	v
74 a	If yes, select all that apply:		
74 a1	Less than one year	Yes	v
74 a2	1 – 2 years	Yes	v
74 a3	3 – 4 years	Yes	v
74 a4	5 years or more	Yes	v
74 a5	Trigger-based or perpetual monitoring reviews	Yes	v
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	v
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	v
76 b	Respondent Banks	Restricted	v
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	v
76 c	Embassies/Consulates	Restricted	v
76 d	Extractive industries	Always subject to EDD	v
76 e	Gambling customers	Restricted	v
76 f	General Trading Companies	Always subject to EDD	v
76 g	Marijuana-related Entities	Always subject to EDD	v
76 h	MSB/MVTS customers	Restricted	v
76 i	Non-account customers	Prohibited	v
76 j	Non-Government Organisations	Always subject to EDD	v
76 k	Non-resident customers	Always subject to EDD	v
76 l	Nuclear power	Always subject to EDD	v
76 m	Payment Service Providers	Restricted	v
76 n	PEPs	Always subject to EDD	v
76 o	PEP Close Associates	Always subject to EDD	v
76 p	PEP Related	Always subject to EDD	v
76 q	Precious metals and stones	Restricted	v
76 r	Red light businesses/Adult entertainment	Restricted	v
76 s	Regulated charities	Always subject to EDD	v
76 t	Shell banks	Prohibited	v
76 u	Travel and Tour Companies	Always subject to EDD	v
76 v	Unregulated charities	Prohibited	v
76 w	Used Car Dealers	Always subject to EDD	v
76 x	Virtual Asset Service Providers	Always subject to EDD	v
76 y	Other (specify)		
77	If restricted, provide details of the restriction	Certain restrictions exist in internal policies related 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	v

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for 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	If appropriate, provide any additional information/context to the answers in this section.	Q76 - As one of the systematically important Belgian financial institutions, Belfius Bank AS can be obligated to provide, under certain conditions, a basic banking service to each business that is established in Belgium and registered in the Belgian Crossroads Bank for Enterprises or that has requested a registration.
8. MONITORING & REPORTING		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Transaction executed at the counter, executed by Bank employees and/or manual pre-screening before introduction.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	FISERV/FCRM
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMENT TRANSPARENCY		
92	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) 2023/1113 on information accompanying transfers of funds and certain crypto-assets and the Fourth AML/CFT directive 2015/849 of 20 May 2015 (transposed into Belgian law by the Law of 18 September 2017).
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. SANCTIONS		
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 foreign financial institutions?	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 'automated' 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 'both' selected, what is the name of the vendor/tool?	FISERV/FCRM for client screening FIRCOSOFT for transaction screening TRADE AI 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	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	v
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	v
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	v
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	v
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	v
106 e	Lists maintained by other G7 member countries	Not used	v
106 f	Other (specify)	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	Same day to 2 business days	v
107 b	Transactions	Same day to 2 business days	v
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	v
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110	If appropriate, provide any additional information/context to the answers in this section.		
11. TRAINING & EDUCATION			
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	v
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	v
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	v
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	v
111 e	Conduct and Culture	Yes	v
111 f	Fraud	Yes	v
112	Is the above mandatory training provided to:		
112 a	Board and Senior Committee Management	Yes	v
112 b	1st Line of Defence	Yes	v
112 c	2nd Line of Defence	Yes	v
112 d	3rd Line of Defence	Yes	v
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	v
112 f	Non-employed workers (contractors/consultants)	No	v
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	v
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	v
114 a	If Y, how frequently is training delivered?	Every Two Years	v
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v

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.	
12. QUALITY 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	Please select 
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	KYC/CDD/EDD and underlying methodologies	Yes 
123 e	Name Screening & List Management	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 l	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, In practice, this can be more often due to external requirements.
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes 
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes 

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.		

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

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)

Belfius Bank SA/NV (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 this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

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

I, Benoît Speybrouck (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.

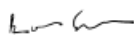
I, Luc Levpuscek (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

_____ (Signature & Date)

_____ (Signature & Date)

19/10/26

Signed by: Benoît Speybrouck
Signed at: 2026-10-20 12:48:36 +02:00
Reason: Witnessing Benoît Speybrouck



Signed by: Luc Levpuscek
Signed at: 2026-10-20 12:10:08 +02:00
Reason: Witnessing Luc Levpuscek

