the Wolfsberg Group

Financial Institution Name:	100	The Premier Bank Limited	8
Location (Country) :		Bangladesh	

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

lo#	Question	Answer	7.7
	ITY & OWNERSHIP		
1	Full Legal Name		
		The Premier Bank Limited	
2	Append a list of branches which are covered by this questionnaire	Attached herewith	
3	Full Legal (Registered) Address	Iqbal Cente, 42 Kemal Atalurk Avenue, Banani, Dhaka-1213, Bangladesh	
4	Full Primary Business Address (If different from above)	As above	
5	Date of Entity incorporation/ establishment	June 10, 1999	
6	Select type of ownership and append an		
6 a	bwnership chart if available Publicly Traded (25% of shares publicly traded)	Yes	V
6 a1	If Y, indicate the exchange traded on and ticker symbol	Dhaka Stock Exchange & Chittagong Stock Exchange Ticker symble: PREMIERBAN	
6 b	Member Owned/ Mutual	Yes	¥
6 c	Government or State Owned by 25% or more	Ňo	T
6 d	Privately Owned	Yes	×
	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	We have no Shareholders or UBO with a holding of 10% shares 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) ?	Yes	V
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Off-Shore Banking Unit, Banani, The Premier Bank Limited, Dhaka	
9	Name of primary financial regulator / supervisory authority	Bangladesh Bank	
10	Provide Legal Entity Identifier (LEI) if available	C-37922(2222) dated June 10, 1999	

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11	Provide the full legal name of the ultimate paren (if different from the Entity completing the DDQ)	The Premier bank Limited
12	Jurisdiction of licensing authority and regulator of ultimate parent	Bangladesh Bank
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	No.
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services/ Custody	No
13 h	Broker/Dealer	Yes
131	Multilateral Development Bank	No.
13 j	Other	
14	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided).	No
14 a	If Y, provide details of the country and %	
15	Select the closest value:	
15 a	Number of employees	1001-5000 Greater than \$500 million
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 ե	If appropriate, provide any additional information / context to the answers in this section.	



17	DOUCTS & SERVICES Does the Entity offer the following products and		-
. /	100		
17.	services:	ble	T
	Correspondent Banking	No.	L
17 a1			-
17 a2	Does the Entity offer Correspondent Banking	No	I
	services to domestic banks?		4
17 a3	Does the Entity allow domestic bank clients to	No	ſ
	provide downstream relationships?		4
17 a4	Does the Entity have processes and procedures		1
	in place to identify downstream relationships	Yes	-1
	with domestic banks?		į
17 a5	Does the Entity offer correspondent banking	No	1
	services to Foreign Banks?	NO	_
17 a6	Does the Entity allow downstream relationships	No	٦
	with Foreign Banks?	NO	
7 a7	Does the Entity have processes and procedures		1
	in place to identify downstream relationships	Yes	1
	with Foreign Banks?		
7 - 0			d
17 a8	Does the Entity offer correspondent banking	No	
	services to regulated MSBs/MVTS?		4
17 a9	Does the Entity allow downstream relationships	No	
	with MSBs/MVTS?	V-	_
17 a10	Does the Entity have processes and procedures		1
	in place to identify downstream relationships	Yes	1
	with MSB /MVTS?		
7 b	Private Banking (domestic & international)	Yes	٦
17 c	Trade Finance	Yes	٦
	Payable Through Accounts	No	1
17 e	Stored Value Instruments	No	i
17 f	Cross Border Bulk Cash Delivery	No.	d
	Domestic Bulk Cash Delivery	No	i
17 g		No .	
	International Cash Letter		4
	Remote Deposit Capture	No	
17.j	Virtual /Digital Currencies	No .	
17 k	Low Price Securities	No	1
17 I	Hold Mail	No	7
7 m	Cross Border Remittances	Yes	
	Service to walk-in customers (non-account		1
· · · ·	holders)	No	1
17 0	Sponsoring Private ATMs	No	1
17 p			_
17 P	Other high risk products and services identified by the Entity	No	
	by the choty		
8	Confirm that all responses provided in the		1
11"	above Section PRODUCTS & SERVICES are	Yes	
	representative of all the LE's branches		
8 a	If N, clarify which questions the difference/s		-
V a	relate to and the branch/es that this applies to.		
	reace to and the prancives that this applies to.		
	Y .		
	16		-
la h			
8 b	If appropriate, provide any additional		
8 b	ir appropriate, provide any additional information / context to the answers in this section.		

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19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards		
	regarding the following components:		
19 a	Appointed Officer with sufficient experience/expertise	Yes	
19 b	Cash Reporting -	Yes	17
19 c	CDD	Yes	
19 d	EDD	Yes	
19 e	Beneficial Ownership	Yes	
19 f	Independent Testing	Yes	15
19 g	Periodic Review	Yes	
19 h	Policies and Procedures	Yes	
19 I	Risk Assessment	Yes	
19 j	Sanctions	Yes	
19 k	PEP Screening	Yes	
191	Adverse Information Screening	Yes	
19 m	Suspicious Activity Reporting	Yes	
19 n	Training and Education	Yes	
19 o	Transaction Monitoring	Yes	
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	50+	
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes	
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Yes	
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	
23 a	If Y, provide further details		1,
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are Representative of all the LE's branches	Yes	-
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
24 Ь	If appropriate, provide any additional information / context to the answers in this section.		



25	Has the Entity documented policies and		To a
25	procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes	·
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	•
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	·
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	·
29	Is the Entity's ABC programme applicable to:		
29 a	Joint ventures	No	Ŧ
29 b	Third parties acting on behalf of the Entity	No	v
30	Does the Entity have a global ABC policy that:		
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes	·
30 Ь	Includes enhanced requirements regarding interaction with public officials?	Yes	-
30 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	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	•
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes	-
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes	•
33 a	If Y select the frequency	12 Months	Ŧ
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	Ţ

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35	Does the Entity's ABC EWRA cover the inherent isk components detailed below:		
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	-
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermedianes	Yes	·
35 c	Transactions, products or services, including thosethat involve state-owned or state-controlled entities or public officials	Yes	-
35 d	Comuption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	-
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	-
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	F
37	Does the Entity provide mandatory ABC training		
37 a	o: Board and Senior Committee Management	Yes	-
37 b	1st Line of Defence	Yes	
37 c	2nd Line of Defence	Yes	-
37 d	3rd Line of Defence	Yes	-
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No	-
37 f	Non-employed workers as appropriate (contractors/consultants)	No	-
38	Does the Entity provide ABC training that is largeted to specific roles, responsibilities and activities?	Yes	-
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes	-
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
39 Б	If appropriate, provide any additional information context to the answers in this section.		

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	LICIES & PROCEDURES		-
40	Has the Entity documented policies and procedures consistent with applicable AML,		
	CTF & Sanctions regulations and requirements		
	to reasonably prevent, detect and report:		
10 a	Money laundering	Yes	T
10 b	Terrorist financing	Yes	7
10 c	Sanctions violations	Yes	
11	Are the Entity's policies and procedures		
* 1	updated at least annually?	Yes	-
12	Are the Entity's policies and procedures gapped		
	against/compared to:		_
42 a	US Standards	Yes	_
42 a1	If Y, does the Entity retain a record of the	Yes	₹
	results?		_
12 Ь	EU Standards	Yes	×
12 b1	If Y, does the Entity retain a record of the	Yes	-
43	results? Does the Entity have policies and procedures		-
43	that;		
43 a	Prohibit the opening and keeping of anonymous	Yes	1
	and fictitious named accounts	Tes .	L
43 b	Prohibit the opening and keeping of accounts		
	for unlicensed banks and/or NBFIs	Yes	-
			_
43 с	Prohibit dealing with other entities that provide		1
	banking services to unlicensed banks	Yes	▼
43 d	Prohibit accounts/relationships with shell banks		
43 u	Fromot accounts relationships with shell belies	Yes	-
	PR 1 15 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
43 e	Prohibit dealing with another entity that provides	Yes	-
	services to shell banks		
43 f	Prohibit opening and keeping of accounts for	V- ·	
	Section 311 designated entities	Yes	-
43 g	Prohibit opening and keeping of accounts for		
+5 g	any of unlicensed/unregulated remittance		115
	agents, exchanges houses, casa de cambio,	Yes	-
	bureaux de change or money transfer agents		117
	balled and the change of money dansier agents		
43 h	Assess the risks of relationships with PEPs,		
	including their family and close associates	Yes	-
43 i	Define escalation processes for financial crime	Yes	-
	risk issues	1 65	
43 j	Define the process, where appropriate, for		
	terminating existing customer relationships due	Yes	-
	to financial crime risk		
43 k	Specify how potentially suspicious activity		
40 K	identified by employees is to be escalated and	Yes	
	investigated	i tes	*
42.1			=
43 I	Outline the processes regarding screening for	Yes	-
	sanctions, PEPs and negative media	163	13
43 m	Outline the processes for the maintenance of		-
	internal 'watchlists"	Yes	-
4.4	Desire Fair defends de del Astrono		_
44	Has the Entity defined a risk tolerance statement or similar document which defines a		100
	risk boundary around their business?	Yes	17
			_
45	Does the Entity have a record retention	Voc	
	procedures that comply with applicable laws?	Yes	1
45 a	If Y, what is the retention period?	6 Voore or more	T
		5 Years or more	Y
46	Confirm that all responses provided in the		
	above Section POLICIES & PROCEDURES are	Yes	▼
	representative of all the LE's branches		
46 a	If N, clarify which questions the difference/s		-
	relate to and the branch/es that this applies to.		
	,		
16 6	If appropriate provide any additional		
16 b	If appropriate, provide any additional		
	information / context to the answers in this section		

	IL, CTF & SANCTIONS RISK ASSESSME	NI E E L COMPANIE DE LA COMPANIE DE	
17	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
17 a	Client	Yes	Ī
17 Ь	Product	Yes	Ī
17 c	Channel	Yes	Ť
17 d	Geography	Yes	T
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		**
48 a	Transaction Monitoring	Yes	L
48 b	Customer Due Diligence	Yes	Ī
48 c	PEP Identification	Yes	Ì
48 d	Transaction Screening	Yes	Ī
48 e	Name Screening against Adverse Media & Negative News	Yes	
48 f	Training and Education	Yes	Ē
48 g	Governance	Yes	Ī
48 h	Management Information	Yes	Ē
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	Ī
49 a	If N, provide the date when the last AML & CTF EWRA was completed.		
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
50 a	Client	Yes	
50 Ь	Product	Yes	Ī
50 ¢	Channel	Yes	Ī
50 d	Geography	Yes	Ť
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
51 a	Customer Due Diligence	Yes	I
51 b	Transaction Screening	Yes	
51 c	Name Screening	Yes	Ī
51 d	List Management	Yes	
51 e	Training and Education	Yes	Ī
51 f	Governance	Yes	Ē
51 g	Management Information	Yes	T
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	Ť
52 a	If N, provide the date when the last Sanctions EWRA was completed.		+
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes	
53 a	If N, clarify which questions the difference/srelate to and the branch/es that this applies to.		=
53 b	If appropriate, provide any additional information / context to the answers in this section.		



54	Does the Entity verify the identity of the		111
	customer?	Yes	<u> </u>
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes	_
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
56 a	Ownership structure	Yes	
56 b	Customer identification	Yes	~
56 c	Expected activity	Yes	_
56 d	Nature of business/employment	Yes	
56 e	Product usage	Yes	-
56 f	Purpose and nature of relationship	Yes	₹
56 g	Source of funds	Yes	
56 h	Source of wealth	Yes	
57	Are each of the following identified:		
57 a	Ultimate beneficial ownership	Yes	
57 a1	Are ultimate beneficial owners verified?	Yes	_
57 b	Authorised signatories (where applicable)	Yes	
57 c	Key controllers	Yes	Ţ
57 d	Other relevant parties		
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	10%	_
59	Does the due diligence process result in customers receiving a risk classification?	Yes	·
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
60 a	Product Usage	Yes	T.
60 b	Geography	Yes	-
60 c	Business Type/Industry	Yes	-
60 d	Legal Entity type	Yes	
60 e	Adverse Information	Yes	-
60 f	Other (specify)		



61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes	·
62	If Y, is this at:		
62 a	Onboarding	Yes	Ŧ
62 b	KYC renewal	Yes	¥
62 c	Trigger event	Yes	V
63	What is the method used by the Entity to screen for adverse media / negative news?	-	
63 a	Automated	Yes	Ŧ
63 b	Manual	No	₹
63 c	Combination of automated and manual	No	V
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	·
65	If Y, is this at:		_
65 a	Onboarding	Yes	₹
65 b	KYC renewal	Yes	Ţ
65 с	Trigger event	Yes	V
66	What is the method used by the Entity to screen PEPs?		
66 a	Automated	Yes	
66 b	Manual	No	▣
66 c	Combination of automated and manual	No	▼
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
68	Does the Entity have a process to review and update customer information based on:		
68 a	KYC renewal	Yes	¥
68 b	Trigger event	Yes	¥
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	•



70	From the list below, which categories of customers or industries are subject to EDD and/ or are restricted, or prohibited by the Entity's FCC programme?		
70 a	Non-account customers	EDD on a risk based approach	T
70 b	Offshore customers	EDD on a risk based approach	₹
70 c	Shell banks	Prohibited	Ŧ
70 d	MVTS/ MSB customers	EDD on a risk based approach	T
70 e	PEPs	EDD on a risk based approach	₹
70 f	PEP Related	EDD on a risk based approach	V
70 g	PEP Close Associate	EDD on a risk based approach	₹
70 h	Correspondent Banks	EDD on a risk based approach	Ŧ
70 h1	if EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes	-
70 i	Anns, defense, military	Prohibited	Ŧ
70 j	Atomic power	Prohibited	
70 k	Extractive industries	Prohibited	₹
70 I	Precious metals and stones	Prohibited	1
70 m	Unregulated charities	Prohibited	-
70 n	Regulated charities	EDD & Restricted on a risk based approach	-
70 o	Red light business / Adult entertainment	Prohibited	T
70 p	Non-Government Organisations	EDD on a risk based approach	V
70 q	Virtual currencies	Prohibited	v
70 r	Marijuana	Prohibited	7
70 s	Embassies/Consulates	EDD on a risk based approach	
70 t	Gambling	Prohibited	T
70 u	Payment Service Provider	Prohibited	₹
70 v	Other (specify)		
71	If restricted, provide details of the restriction	As per policy of the Bank	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	-
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes	Ī
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
73 b	If appropriate, provide any additional information <i>i</i> context to the answers in this section.		



8. MC	NITORING & REPORTING		E
74	Does the Entity have risk based policies,		Г
	procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
75	What is the method used by the Eritity to monitor transactions for suspicious activities?		
75 a	Automated	Yes	•
75 b	Manual	No	Ē
75 c	Combination of automated and manual	No	Ē
76	If manual or combination selected, specify what type of transactions are monitored manually		
77	Does the Entity have regulatory requirements to report currency transactions?	Yes	T.
77 a	If Y, does the Entity have policies, procedures andprocesses to comply with currency reporting requirements?	Yes	-
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes	Ţ
'9 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		-
79 b	If appropriate, provide any additional information / context to the answers in this section.		
9. PA	YMENT TRANSPARENCY		
30	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	Ţ
31	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:		
31 a	FATF Recommendation 16	Yes	T
11 b	Local Regulations	Yes	Ť
31 Ь1	Specify the regulation	Anti Money Laundering Act 2012 Anti Money Laundering Act 2015 (Amended)	_
11 c	If N, explain		
2	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	•

84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes	
85	Confirm that all responses provided in the aboveSection PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes	-
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
B5 b	If appropriate, provide any additional information / context to the answers in this section.		
10 8	ANCTIONS		
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes	
87	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes	•
88	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes	•
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	-
90	What is the method used by the Entity?		
90 a	Manual	No	7
90 b	Automated	Yes	Y
90 c 91	Combination of Automated and Manual Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes	•
92	What is the method used by the Entity?		
92 a	Manual	No	-
92 b	Automated	Yes	¥
92 c	Combination Automated and Manual	No	Y
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	T
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	
93 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for fillering transactional data	



93 f	Other (specify)		
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days	Ţ
95	When updates or additions to the Sarictions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:		7,
95 a	Customer Data	Daily	
95 b	Transactions	Daily	
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	1
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes	F
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
97 Ь	If appropriate, provide any additional information / context to the answers in this section.		
11. T	RAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :		
98 a	Identification and reporting of transactions to government authorities	Yes	-
98 Ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	Ţ
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	Ī
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes	Ţ
98 e	Conduct and Culture	Yes	-
99	Is the above mandatory training provided to :		
99 a	Board and Senior Committee Management	Yes	F
99 b	1st Line of Defence	Yes	F
99 c	2nd Line of Defence	Yes	
99 d	3rd Line of Defence	Yes	
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable	•
99 f	Non-employed workers (contractors/consultants)	No	-
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes	-
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101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Corrfirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
12. Q	UALITY ASSURANCE /COMPLIANCE TE	STING
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	
13. Al	UDIT	
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Component based reviews
107 Ь	External Third Party	Yearly



108	Does the internal audit function or other independent third party cover the following areas:		
108 a	AML, CTF & Sanctions policy and procedures	Yes	-
108 Ь	KYC / CDD / EDD and underlying methodologies	Yes	-
108 с	Transaction Monitoring	Yes	
108 d	Transaction Screening including for sanctions	Yes	_
108 e	Name Screening & List Management	Yes	
108 ſ	Training & Education	Yes	<u> </u>
108 g	Technology	Yes	
108 h	Governance	Yes	¥
108 i	Reporting/Metrics & Management Information	Yes	100
108 j	Suspicious Activity Filing	Yes	7
108 k	Enterprise Wide Risk Assessment	Yes	-
1081	Other (specify)		
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	
110	Confirm that all responses provided in the above Section, AUDIT are representative of all the LE's branches	Yes	*
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110 b	If appropriate, provide any additional information / context to the answers in this section.		



Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

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) The Premier Bank Limited ... (Bank 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 Premier Bank Limited (Bank name) 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. (Bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. The Premier Bank Limited (Bank name) further certifies it complies with/is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Premier Bank Limited (Bank name) commits to file accurate supplemental information on a timely basis. Mohammad Ashraf-ul Islam, EVP (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 Premier Bank Limited Sami Karim DMD & CAMLCO (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 Premier Bank Limited (Bank name) Mohammad Ashraf-ul Islam Signature & Date (DD/MM/YYYY)) Function Vice President, International Division The Premier Bank Limited, Head Office Dhara, Bangladesh (Signature & Date (DD/MM/YYYY))

Sami Karim*
Deputy Managing Director
COO & CAMLCO
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