



Financial Institution Name: Bank BPH S.A.  
 Location (Country): Poland

Bank BPH S.A.
Poland

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 DDC. This questionnaire should not cover more than one LE. Each question in the DDC 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.

No #	Question	Answer
1	Full Legal Name	Bank BPH S.A.
2	Append a list of branches which are covered by this questionnaire	Bank BPH S.A. does not have any branches.
3	Full Legal (Registered) Address	ul. P.K. Palubickiego 2 80-175 Gdansk Poland
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	April 11, 1988
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	Yes
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If 'Y', provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	GE Investments Poland sp. z o.o. (General Electric Company group)
7	% of the Entity's total shares composed of bearer shares	0%
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 branches which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	The Polish Financial Supervision Authority (KNF)
10	Provide Legal Entity Identifier (LEI) if available	H8MIG1MMPR6JXUQVBM04

11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	General Electric Company
12	Jurisdiction of licensing authority and regulator of ultimate parent	USA
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	No
13 d	Transactional Banking	No
13 e	Investment Banking	No
13 f	Financial Markets Trading	No
13 g	Securities Services/ Custody	No
13 h	Broker/Dealer	No
13 i	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 off-shore 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	51-200
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	No
16 a	If 'N', clarify which questions the differences/ relate to and the branches that this applies to.	16 Bank BPH S.A. does not have any branch
16 b	If appropriate, provide any additional information / context to the answers in this section.	

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

Bank BPH services only mortgages for the individual customers (no new sale).

18 Bank BPH S.A. does not have any branches

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

**4. ANTI-BRIBERY & CORRUPTION**

25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to (reasonably) prevent, detect and report bribery and corruption?	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	Yes
29 b	Third parties acting on behalf of the Entity	Yes
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 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 c	Includes a prohibition against the falsification of books and records (this may be within the ABC Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programmes?	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
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

35	Does the Entity's ABC EWRRA cover the inherent risk 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 intermediaries	Yes
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/influencing, 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
37	Does the Entity provide mandatory ABC training to:	
37 a	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	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
38	Does the Entity provide ABC training that is targeted 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	No
39 a	If 'No', clarify which questions the differences relate to and the branches that this applies to.	39 Bank BPH does not have any branches.
39 b	If appropriate, provide any additional information in context to the answers in this section.	

5. POLICIES & PROCEDURES	
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report money laundering, terrorist financing
40 a	Yes
40 b	Yes
40 c	Yes
41	Are the Entity's policies and procedures updated at least annually?
42	Are the Entity's policies and procedures gapped against/compared to:
42 a	US Standards
42 a1	Yes
42 a1	If Y, does the Entity retain a record of the results?
42 b	EU Standards
42 b1	Yes
42 b1	If Y, does the Entity retain a record of the results?
43	Does the Entity have policies and procedures that:
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts
43 a	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs
43 b	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks
43 c	Yes
43 d	Prohibit accounts/relationships with shell banks
43 d	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks
43 e	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities
43 f	Yes
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents
43 g	Yes
43 h	Assess the risks of relationships with PEPs, including their family and close associates
43 h	Yes
43 i	Define escalation processes for financial crime risk issues
43 i	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk
43 j	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated
43 k	Yes
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media
43 l	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"
43 m	No
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?
44	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?
45	Yes
45 a	If Y, what is the retention period?
45 a	5 Years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches
46	No
46 a	If N, clarify which questions the differences/relate to and the branches that this applies to.
46 a	46 Bank BPH does not have any branches.
46 b	If appropriate, provide any additional information / context to the answers in this section.

6. AML, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:
47 a	Client
47 b	Product
47 c	Channel
47 d	Geography
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:
48 a	Transaction Monitoring
48 b	Customer Due Diligence
48 c	PEP Identification
48 d	Transaction Screening
48 e	Name Screening against Adverse Media & Negative News
48 f	Training and Education
48 g	Governance
48 h	Management Information
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?
49 a	If N, provide the date when the last AML & CTF EWRA was completed.
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:
50 a	Client
50 b	Product
50 c	Channel
50 d	Geography
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:
51 a	Customer Due Diligence
51 b	Transaction Screening
51 c	Name Screening
51 d	List Management
51 e	Training and Education
51 f	Governance
51 g	Management Information
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?
52 a	If N, provide the date when the last Sanctions EWRA was completed.
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches
53 a	If N, clarify which questions the difference/relate to and the branches that this applies to.
53 b	If appropriate, provide any additional information / context to the answers in this section.
53 Bank BPH does not have any branches.	



54	Does the Entity verify the identity of the customer?	Yes
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	No
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	No
57 a1	Are ultimate beneficial owners verified?	No
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	No
57 d	Other relevant parties	Owner of a collateral (if applicable), inheritor, proxy, warrantor.
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	25%
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
60 b	Geography	Yes
60 c	Business Type/Industry	No
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	PEP status.

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
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	Yes
63 b	Manual	No
63 c	Combination of automated and manual	No
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
65 c	Trigger event	Yes
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 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	Prohibited
70 b	Offshore customers	Prohibited
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibited
70 e	PEPs	Prohibited
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
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	Arms, defense, military	
70 j	Atomic power	
70 k	Extractive industries	
70 l	Precious metals and stones	
70 m	Unregulated charities	
70 n	Regulated charities	
70 o	Red light business / Adult entertainment	
70 p	Non-Government Organisations	
70 q	Virtual currencies	
70 r	Marijuana	
70 s	Embassies/Consulates	
70 t	Gambling	
70 u	Payment Service Provider	
70 v	Other (specify)	70 u. Bank BPH does not provide services for business customers.
71	If restricted, provide details of the restriction	
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	No
73 a	If 'N', clarify which questions the differences relate to and the branches that this applies to	73 Bank BPH does not have any branches.
73 b	If appropriate, provide any additional information / context to the answers in this section.	

8. MONITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?
75 a	Automated
75 b	Manual
75 c	Combination of automated and manual
75 c	Yes
76	If manual or combination selected, specify what type of transactions are monitored manually: 1. The repayments of the mortgages; 2. The applications for modifications of the agreements.
77	Does the Entity have regulatory requirements to report currency transactions? No
77 a	If 'Y', does the Entity have policies, procedures and processes to comply with currency reporting requirements?
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches No
79 a	If 'N', clarify which questions the difference/s relate to and the branches that this applies to 79 Bank BPH does not have any branches.
79 b	If appropriate, provide any additional information / context to the answers in this section.
9. PAYMENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Yes
81	Does the Entity have policies, procedures and processes to (reasonably) comply with and have controls in place to ensure compliance with: FATF Recommendation 16
81 a	Yes
81 b	Local Regulations
81 b	Yes
81 b1	Specify the regulation 1. Polish Act of 1 March 2018 on countering money laundering and terrorist financing. 2. Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006.
81 c	If 'N', explain
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Yes

84	Yes	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?
85	Yes	Confirm that all responses provided in the above Section PAYMENT TRANSFERENCE are representative of all the LE's branches
85 a	No	If 'N', clarify which questions the difference/s relate to and the branches that this applies to.
85 b		If appropriate, provide any additional information / context to the answers in this section.
<b>10. SANCTIONS</b>		
86	Yes	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to business conducted with, or through accounts held at foreign financial institutions?
87	Yes	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?
88	Yes	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 shipping, or the submission and/or masking, of sanctions relevant information in cross border transactions?
89	Yes	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?
90	Yes	What is the method used by the Entity?
90 a	Manual	
90 b	Automated	
90 c	Combination of Automated and Manual	
91	Yes	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?
92	Yes	What is the method used by the Entity?
92 a	Manual	
92 b	Automated	
92 c	Combination Automated and Manual	
93	Yes	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
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 c	Office of Financial Sanctions Implementation (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 filtering transactional data
93 e	Lists maintained by other G7 member countries	

93 f	Other (specify)	eg. HM TREASURY SANCTIONS, FBI MOST WANTED TERRORISTS.
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
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:	
95 a	Customer Data	Same day to 2 days
95 b	Transactions	Same day to 2 days
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
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	No
97 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	97 Bank BPH does not have any branches.
97 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
98	Does the Entity provide mandatory training, which includes:	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to:	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
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)	Not Applicable
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	No
102 a	If 'N', clarify which questions the differences/relate to and the branches that this applies to.	102 Bank BPH does not have any branches
102 b	If appropriate, provide any additional information / context to the answers in this section.	99e - The outsourcer is the financial institution & is obliged to provide relevant training to its staff.
<b>12. QUALITY ASSURANCE / COMPLIANCE TESTING</b>		
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	No
105 a	If 'N', clarify which questions the differences/relate to and the branches that this applies to.	105 Bank BPH does not have any branches.
105 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>13. AUDIT</b>		
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 b	External Third Party	Component based reviews

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 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 l	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 A, U, D, T are representative of all the LE's branches	No
110 a	If 'N', clarify which questions the differences relate to and the branches that this applies to.	110 Bank BPH does not have any branches.
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)

(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.

(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.

(Bank name) further certifies it complies with/its 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.

(Bank name) commits to file accurate supplemental

information on a timely basis.

I, Dominik Luterek 12/07/2019 (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 Bank BPH SA (Bank name)

I, Prof Oleksy (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 Bank BPH SA (Bank name)

Prof Oleksy 09/07/2019 (Signature & Date (DD/MM/YYYY))

Dominik Luterek 12/07/2019 (Signature & Date (DD/MM/YYYY))