the Wolfsberg Group

Financial Institution Name:	BANCO SECURITY
Location (Country) :	CHILE

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 subsection. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

-	d for that branch.	
No#	Question	Answer
	TY & OWNERSHIP	
1	Full Legal Name	BANCO SECURITY
2	Append a list of foreign branches which are covered by this questionnaire	All Branches
3	Full Legal (Registered) Address	Apoquindo 3150, Las Condes. Santiago de Chile
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	Sept 16th, 1981
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	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	Please visit http://ir-en.security.cl
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 branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Comisión Para el Mercado Financiero (www.cmfchile.cl)

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	(ii different from the Entity completing the DDQ)	GRUPO SECURITY (www.security.cl)
12	Jurisdiction of licensing authority and regulator of	
	ultimate parent	Chile
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 Panking	100
13 a	Transactional Banking	Yes
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	INU .
131	Widitiateral Development Bank	No
13 j	Other	
14	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	No
	customers primarily resident in a different jurisdiction to the location where bank services	
44	are provided.)	
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value:	
13	ocioci ilie ciosesi value.	
15 a	Number of employees	1001-5000
15 b	Total Assets	
		Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are	Yes
	representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	to and the prantines that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	
	CONTRACTO THE MISSWORD IN THIS SECTION.	

	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	No
17 a1	lf 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)	No
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 ј	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	No
17 m	Cross Border Remittances	No
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	No
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	
	ĺ	1

0 454	OTE & CANOTIONS DECORATION	
3. AML,		
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	
19 a	experience/expertise	Yes
19 b	Cash Reporting	
19 0	Cash Reporting	Yes
19 c	CDD	
		Yes
19 d	EDD	
		Yes
19 e	Beneficial Ownership	Yes
		165
19 f	Independent Testing	Yes
		100
19 g	Periodic Review	Yes
40.1	D.F.: ID. I	
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	
191	TABLE PROGRAMMENT	Yes
19 j	Sanctions	
,		Yes
19 k	PEP Screening	Ver
		Yes
19 I	Adverse Information Screening	Yes
		100
19 m	Suspicious Activity Reporting	Yes
10		
19 n	Training and Education	Yes
19 o	Transaction Monitoring	
	Transaction memoring	Yes
20	How many full time employees are in the Entity's	
	AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior Management Committee receive regular reporting	
	on the status of the AML, CTF & Sanctions	Quarterly/Every three months
	programme?	
23	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions	No
	programme?	
23 a	If Y, provide further details	
-		
24	Confirm that all responses provided in the above	
	Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
	are representative or all the LE 3 branches	
24 a	If N, clarify which questions the difference/s relate	
	to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information /	
	context to the answers in this section.	

4. ANT	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and corruption?	
26	Does the Entity have an enterprise wide	Yes
	programme that sets minimum ABC standards?	163
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	Yes
	responsible for coordinating the ABC	
	programme?	
28	Does the Entity have adequate staff with	W
	appropriate levels of experience/expertise to implement the ABC programme?	Yes
20	Is the Entity's ABC programme applicable to:	
29	is the Entity's ABC programme applicable to.	Not Applicable
30	Does the Entity have a global ABC policy that:	
30	2000 and Emility mave a global ADO 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	Yes
	indirectly, if improperly intended to influence	
	action or obtain an advantage	
30 b	Includes enhanced requirements regarding	Yes
	interaction with public officials?	
30 с	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC	Yes
	policy or any other policy applicable to the Legal	
31	Entity)? Does the Entity have controls in place to monitor	
31	the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management	
32	Committee receive regular Management	Yes
	Information on ABC matters?	
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	Yes
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
35 a	Potential liability created by intermediaries and	Voc
	other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and	
	industries in which the Entity does business,	Yes
	directly or through intermediaries	
35 с	Transactions, products or services, including	
	those that involve state-owned or state-controlled	Yes
	entities or public officials	
35 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable donations	Yes
	and political contributions	
35 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	
36	Does the Entity's internal audit function or other	W.
	independent third party cover ABC Policies and	Yes
	Procedures?	

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)	No
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	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCE	DURES
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	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 results?	Not Applicable
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Not Applicable
43	Does the Entity have policies and procedures	<u> </u>
43 a	that: Prohibit the opening and keeping of anonymous	Yes
43 b	and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes
43 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides	Yes
43 f	services to shell banks Prohibit opening and keeping of accounts for	Yes
	Section 311 designated entities	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	Yes
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

6 AMI	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
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 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
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/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7 KV	V KVC CDD and CDD	
	. KYC, CDD and EDD	
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	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
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	V
		Yes
60 b	Geography	Yes
		165
60 с	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Advarage Information	
60 е	Adverse Information	Yes
60 f	Other (specify)	
00 1	Other (appeary)	
61	Does the Entity have a risk based approach to	
	screening customers for adverse media/negative	Yes
	news?	
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
	Trimmer count	
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen	
0.5	for adverse media / negative news?	Automated
64	Does the Entity have a risk based approach to	
	screening customers and connected parties to	W
	determine whether they are PEPs, or controlled	Yes
	by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	
a co	KTC renewal	Yes
65 c	Trigger event	
"	Triggor ovoit	Yes
66	What is the method used by the Entity to screen	
	PEPs?	Automated
67	Does the Entity have policies, procedures and	
	processes to review and escalate potential	
	matches from screening customers and	Yes
	connected parties to determine whether they are PEPs, or controlled by PEPs?	
68	Does the Entity have a process to review and	
ات	update customer information based on:	
68 a	KYC renewal	W.
		Yes
68 b	Trigger event	Voc
		Yes
69	Does the Entity maintain and report metrics on	
	current and past periodic or trigger event due	Yes
	diligence reviews?	

	_	
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	Non-resident customers	
		Prohibited
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibited
70 e	PEPs	EDD on a risk based approach
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	EDD on a risk based approach
70 j	Atomic power	EDD on a risk based approach
70 k	Extractive industries	EDD on a risk based approach
70 I	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	
<u></u>	le distribution de la company	
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	Yes
	of all the LE's branches	
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 / context to the answers in this section.	
	I.	I

8 MOI	3. 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?	Automated	
76	If manual or combination selected, specify what type of transactions are monitored manually		
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction 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	
79 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. PAY). 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:		
81 a	FATF Recommendation 16	Yes	
81 b	Local Regulations	Yes	
81 b1	Specify the regulation	Circular N°59 de la Unidad de analisis Financiero (www.uaf.cl)	
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	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes	
85	Confirm that all responses provided in the above Section 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.		
85 b	If appropriate, provide any additional information / context to the answers in this section.		

10. SA	NCTIONS	
86	Does the Entity have a Sanctions Policy approved	
00	by management regarding compliance with	
	sanctions law applicable to the Entity, including	
	with respect its business conducted with, or	Yes
	through accounts held at foreign financial	
	institutions?	
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	Yes
	sanctions prohibitions applicable to the other	
	entity (including prohibitions within the other	
	entity's local jurisdiction)?	
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	Yes
	resubmission and/or masking, of sanctions	
	relevant information in cross border transactions?	
89	Does the Entity screen its customers, including	
33	beneficial ownership information collected by the	
	Entity, during onboarding and regularly thereafter	Yes
	against Sanctions Lists?	
90	What is the method used by the Entity?	
	, , ,	Automated
91	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location	Yes
	information, contained in cross border	res
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	Automated
		Automateu
93	Select the Sanctions Lists used by the Entity in its	
-	sanctions screening processes:	
93 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
93 b	Sanctions List (UN) United States Department of the Treasury's Office	
93 D	of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
93 c	Office of Financial Sanctions Implementation HMT	
93 C	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	
93 a	European Onion Consolidated List (EO)	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	
93 E	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
93 f	Other (specify)	
	Outor (opeony)	
94	Question removed	
	2000.00110110700	
95	When regulatory authorities make updates to their	
1	Sanctions list, how many business days before	
1	the entity updates their active manual and/or	
L	automated screening systems against:	
95 a	Customer Data	
		Come devide O business devis
		Same day to 2 business days
95 b	Transactions	
1		Same day to 2 business days
	1	1

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	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

11 TR	11. TRAINING & EDUCATION		
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 с	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	
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	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. QU	12. QUALITY ASSURANCE /COMPLIANCE TESTING		
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. AU	3. AUDIT		
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	Yearly	
107 b	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 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 I	Other (specify)		
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?		
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 Qu Declaration Statement (To be signed by Global Head of Corr Money Laundering, Chief Compliance Officer, Global Head of	respondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti-
	(Financial Institution name) is fully committed to the fight against financial crime and makes ancial 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 and regulatory obligations.	of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its lega
The Financial Institution recognises the importance of transp standards.	varency regarding parties to transactions in international payments and has adopted/is committed to adopting these
	vorking to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The urrent and will be updated no less frequently than on an annual basis.
The Financial Institution commits to file accurate supplement	tal information on a timely basis.
MATIAS ERRAZURIZ	
I, the answers provided in this Wolfsberg CBDDQ are complet lns MAURICIO PARRA LEGRAND	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that le and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
I, BANCO SECURITY Wolfsberg CBDDQ are complete and correct to my honest b	(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this eleief, and that I am authorised to execute this declaration on behalf of the Financial Institution. 28.07.2021
Mana	(Signature & Date)
Modella	28.07.2021
	(Signature & Date)