

# the Wolfsberg Group

Financial Institution Name:

Location (Country) :

STANDARD BANK PLC.

BANGLADESH

| No #   | Question   | Answer   |
|--|--|--|
| <b>1. ENTITY &amp; OWNERSHIP</b>             |  |  |
| 1  | Full Legal name  | STANDARD BANK PLC.   |
| 2  | Append a list of foreign branches which are covered by this questionnaire (if applicable)  | ALL SUBSIDIARIES & BRANCHES  |
| 3  | Full Legal (Registered) Address  | METROPOLITAN CHAMBER BUILDING (3RD FLOOR), 122-124 MOTIJHEEL C/A, DHAKA-1000, BANGLADESH |
| 4  | Full Primary Business Address (if different from above)  | NOT APPLICABLE   |
| 5  | Date of Entity incorporation/establishment   | 11-05-99   |
| 6  | Select type of ownership and append an ownership chart if available  |  |
| 6 a  | Publicly Traded (25% of shares publicly traded)  | Yes  |
| 6 a1   | If Y, indicate the exchange traded on and ticker symbol  | DHAKA STOCK EXCHANGE PLC. (DSE), CHITTAGONG STOCK EXCHANGE (CSE), STANDBANKL             |
| 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  | NO SUCH SHAREHOLDER  |
| 7  | % of the Entity's total shares composed of bearer shares   | NIL  |
| 8  | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?   | Yes  |
| 8 a  | If Y, provide the name of the relevant branch/es which operate under an OBL  | OFFSHORE BANKING UNIT (OBU), STANDARD BANK PLC.  |
| 9  | Does the Bank have a Virtual Bank License or provide services only through online channels?  | No   |
| 10   | Provide Legal Entity Identifier (LEI) if available   | 5493009EICRTF6188136   |
| <b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b> |  |  |
| 11   | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  |  |
| 11 a   | Appointed Officer with sufficient experience/expertise   | Yes  |
| 11 b   | Adverse Information Screening  | Yes  |
| 11 c   | Beneficial Ownership   | Yes  |
| 11 d   | Cash Reporting   | Yes  |
| 11 e   | CDD  | Yes  |
| 11 f   | EDD  | Yes  |
| 11 g   | Independent Testing  | Yes  |
| 11 h   | Periodic Review  | Yes  |
| 11 i   | Policies and Procedures  | Yes  |
| 11 j   | PEP Screening  | Yes  |
| 11 k   | Risk Assessment  | Yes  |
| 11 l   | Sanctions  | Yes  |
| 11 m   | Suspicious Activity Reporting  | Yes  |
| 11 n   | Training and Education   | Yes  |
| 11 o   | Transaction Monitoring   | Yes  |
| 12   | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?   | Yes  |
| 13   | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?   | No   |
| 13 a   | If Y, provide further details  |  |
| 14   | Does the entity have a whistleblower policy?   | Yes  |
| <b>3. ANTI BRIBERY &amp; CORRUPTION</b>      |  |  |
| 15   | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes  |



|  |  |                 |
|--|--|-----------------|
| 16   | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  | Yes             |
| 17   | Does the Entity provide mandatory ABC training to:   |                 |
| 17 a   | Board and Senior Committee Management  | Yes             |
| 17 b   | 1st Line of Defence  | Yes             |
| 17 c   | 2nd Line of Defence  | Yes             |
| 17 d   | 3rd Line of Defence  | Yes             |
| 17 e   | Third parties to which specific compliance activities subject to ABC risk have been outsourced   | Not Applicable  |
| 17 f   | Non-employed workers as appropriate (contractors/consultants)  | Not Applicable  |
| <b>4. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b> |  |                 |
| 18   | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:   |                 |
| 18 a   | Money laundering   | Yes             |
| 18 b   | Terrorist financing  | Yes             |
| 18 c   | Sanctions violations   | Yes             |
| 19   | Does the Entity have policies and procedures that:   |                 |
| 19 a   | Prohibit the opening and keeping of anonymous and fictitious named accounts  | Yes             |
| 19 b   | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs   | Yes             |
| 19 c   | Prohibit dealing with other entities that provide banking services to unlicensed banks   | Yes             |
| 19 d   | Prohibit accounts/relationships with shell banks   | Yes             |
| 19 e   | Prohibit dealing with another Entity that provides services to shell banks   | Yes             |
| 19 f   | Prohibit opening and keeping of accounts for Section 311 designated entities   | Yes             |
| 19 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             |
| 19 h   | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  | Yes             |
| 19 i   | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  | Yes             |
| 19 j   | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News  | Yes             |
| 20   | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?   | Yes             |
| 21   | Does the Entity have record retention procedures that comply with applicable laws?   | Yes             |
| 21 a   | If Y, what is the retention period?  | 5 years or more |
| <b>5. KYC, CDD and EDD</b>                                   |  |                 |
| 22   | Does the Entity verify the identity of the customer?   | Yes             |
| 23   | 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             |
| 24   | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:   |                 |
| 24 a   | Customer identification  | Yes             |
| 24 b   | Expected activity  | Yes             |
| 24 c   | Nature of business/employment  | Yes             |
| 24 d   | Ownership structure  | Yes             |
| 24 e   | Product usage  | Yes             |
| 24 f   | Purpose and nature of relationship   | Yes             |
| 24 g   | Source of funds  | Yes             |
| 24 h   | Source of wealth   | Yes             |
| 25   | Are each of the following identified:  |                 |
| 25 a   | Ultimate beneficial ownership  | Yes             |
| 25 a1  | Are ultimate beneficial owners verified?   | Yes             |
| 25 b   | Authorised signatories (where applicable)  | Yes             |
| 25 c   | Key controllers  | Yes             |

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|                                      |  |  |
|--------------------------------------|--|--|
| 25 d                                 | Other relevant parties   | Yes  |
| 26                                   | Does the due diligence process result in customers receiving a risk classification?  | Yes  |
| 27                                   | 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  |
| 28                                   | 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  |
| 29                                   | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?   | Yes  |
| 29 a                                 | If yes, select all that apply:   |  |
| 29 a1                                | Less than one year   | No   |
| 29 a2                                | 1 – 2 years  | Yes  |
| 29 a3                                | 3 – 4 years  | No   |
| 29 a4                                | 5 years or more  | Yes  |
| 29 a5                                | Trigger-based or perpetual monitoring reviews  | Yes  |
| 29 a6                                | Other (please specify)   | KYC review is done annually for high risk customers and in every five years for low risk customers.  |
| 30                                   | 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?  |  |
| 30 a                                 | Arms, Defence, Military  | EDD on a risk based approach   |
| 30 b                                 | Respondent Banks   | Always subject to EDD  |
| 30 b1                                | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  | Yes  |
| 30 c                                 | Embassies/Consulates   | EDD on a risk based approach   |
| 30 d                                 | Extractive industries  | Do not have this category of customer or industry  |
| 30 e                                 | Gambling customers   | Prohibited   |
| 30 f                                 | General Trading Companies  | EDD on a risk based approach   |
| 30 g                                 | Marijuana-related Entities   | Prohibited   |
| 30 h                                 | MSB/MVTS customers   | EDD on a risk based approach   |
| 30 i                                 | Non-account customers  | EDD on a risk based approach   |
| 30 j                                 | Non-Government Organisations   | EDD on a risk based approach   |
| 30 k                                 | Non-resident customers   | EDD on a risk based approach   |
| 30 l                                 | Nuclear power  | Do not have this category of customer or industry  |
| 30 m                                 | Payment Service Providers  | EDD on a risk based approach   |
| 30 n                                 | PEPs   | EDD on a risk based approach   |
| 30 o                                 | PEP Close Associates   | EDD on a risk based approach   |
| 30 p                                 | PEP Related  | EDD on a risk based approach   |
| 30 q                                 | Precious metals and stones   | Do not have this category of customer or industry  |
| 30 r                                 | Red light businesses/Adult entertainment   | Prohibited   |
| 30 s                                 | Regulated charities  | EDD on a risk based approach   |
| 30 t                                 | Shell banks  | Prohibited   |
| 30 u                                 | Travel and Tour Companies  | EDD on a risk based approach   |
| 30 v                                 | Unregulated charities  | Prohibited   |
| 30 w                                 | Used Car Dealers   | EDD on a risk based approach   |
| 30 x                                 | Virtual Asset Service Providers  | Prohibited   |
| 30 y                                 | Other (specify)  | N/A  |
| 31                                   | If restricted, provide details of the restriction  |  |
| <b>6. MONITORING &amp; REPORTING</b> |  |  |
| 32                                   | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?   | Yes  |
| 33                                   | What is the method used by the Entity to monitor transactions for suspicious activities?   | Combination of automated and manual  |
| 33 a                                 | If manual or combination selected, specify what type of transactions are monitored manually  | Occasional Transaction, Repeated Transaction occurred below the reporting threshold i.e. 1.0 million |
| 34                                   | Does the Entity have regulatory requirements to report suspicious transactions?  | Yes  |
| 34 a                                 | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?   | Yes  |
| 35                                   | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?  | Yes  |

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| 7. PAYMENT TRANSPARENCY |  |   |
|-------------------------|--|---|
| 36                      | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?  | Yes   |
| 37                      | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:   |   |
| 37 a                    | FATF Recommendation 16   | Yes   |
| 37 b                    | Local Regulations  | Yes   |
| 37 b1                   | If Y, Specify the regulation   | Money Laundering Prevention Act 2012 (Amended 2015), Anti-Terrorism Act 2009 (Amended 2012 & 2013), Foreign Exchange Regulations Act 1947 (Amended 2015), Guidelines for Foreign Exchange Transactions, BFIU Master Circular 26 |
| 37 c                    | If N, explain  |   |
| 8. SANCTIONS            |  |   |
| 38                      | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?  | Yes   |
| 39                      | 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   |
| 40                      | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  | Yes   |
| 41                      | Select the Sanctions Lists used by the Entity in its sanctions screening processes:  |   |
| 41 a                    | Consolidated United Nations Security Council Sanctions List (UN)   | Used for screening customers and beneficial owners and for filtering transactional data   |
| 41 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   |
| 41 c                    | Office of Financial Sanctions Implementation HMT (OFSI)  | Used for screening customers and beneficial owners and for filtering transactional data   |
| 41 d                    | European Union Consolidated List (EU)  | Used for screening customers and beneficial owners and for filtering transactional data   |
| 41 e                    | Lists maintained by other G7 member countries  | Used for screening customers and beneficial owners and for filtering transactional data   |
| 41 f                    | Other (specify)  |   |
| 42                      | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?   | No  |
| 9. TRAINING & EDUCATION |  |   |
| 43                      | Does the Entity provide mandatory training, which includes:  |   |
| 43 a                    | Identification and reporting of transactions to government authorities   | Yes   |
| 43 b                    | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  | Yes   |
| 43 c                    | Internal policies for controlling money laundering, terrorist financing and sanctions violations   | Yes   |
| 43 d                    | New issues that occur in the market, e.g. significant regulatory actions or new regulations  | Yes   |
| 44                      | Is the above mandatory training provided to :  |   |
| 44 a                    | Board and Senior Committee Management  | Yes   |
| 44 b                    | 1st Line of Defence  | Yes   |
| 44 c                    | 2nd Line of Defence  | Yes   |
| 44 d                    | 3rd Line of Defence  | Yes   |
| 44 e                    | Third parties to which specific FCC activities have been outsourced  | No  |
| 44 f                    | Non-employed workers (contractors/consultants)   | Yes   |
| 10. AUDIT               |  |   |

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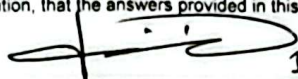
|    |   |     |
|----|---|-----|
| 45 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Yes |
|----|---|-----|

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Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

\_\_\_\_\_ Standard Bank PLC. \_\_\_\_\_ (Financial Institution name)

I, Md. Limon Sikder (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.



14.09.2025  
(Signature & Date)

**Md. Limon Sikder**  
DCAMLCO &  
Head of AML & CFT Division  
Standard Bank PLC.  
Head Office, Dhaka.