

Financial Institution Name: Location (Country) :

BANCA COMERCIALA ROMANA SA ROMANIA

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
	& OWNERSHIP	
1. LINITI I	Full Legal Name	DAMES CONTROLLA DOMANA CA
'	Tuli Legai Name	BANCA COMERCIALA ROMANA SA
2	Append a list of foreign branches which are covered	
*	by this questionnaire	
	by the queetermane	
	Fill Local (Decistored) Address	
3	Full Legal (Registered) Address	NO 15D SOS ORHIDEELOR, THE BRIDGE 1 BUILDING, 2ND FLOOR, DISTRICT 6, BUCHAREST, ROMANIA
		BOOTAREST, ROMANIA
4		
4	Full Primary Business Address (if different from	
	above)	
_		
5	Date of Entity incorporation/establishment	23.01.1991
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	ERSTE GROUP BANK AG - 99,8893%
	beneficial owners with a holding of 10% or more	ENOTE ONOOF BANK AC - 33,003370
7	% of the Entity's total shares composed of bearer	NOT APPLICABLE
	shares	INOT ALL LIOADEL
8	Does the Entity, or any of its branches, operate under	No V
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	No 🔻
	provide services only through online channels?	
10	Name of primary financial regulator/supervisory	NATIONAL BANK OF ROMANIA
	authority	
11	Provide Legal Entity Identifier (LEI) if available	549300ORLU6LN5YD8X90
12	Provide the full legal name of the ultimate parent (if	ERSTE GROUP BANK AG
	different from the Entity completing the DDQ)	
	1	

13	Jurisdiction of licensing authority and regulator of	Austria; Austrian Financial Market Authority (FMA)
	ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
	Broker/Dealer	
14 h		Yes
14 i	Multilateral Development Bank	No 💌
14 j	Wealth Management	Yes
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No  ▼
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	5001-10000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Creater trial \$500 million
''	Section are representative of all the LE's branches.	Yes
47	•	
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	Yes
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	V
	services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	No V
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	domestic banks?	165
10 11		<u> </u>
19 a1d	Does the Entity offer Correspondent Banking	Yes
	services to foreign banks?	· · ·
19 a1e	Does the Entity allow downstream relationships	No V
	with foreign banks?	
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	No ·
	(MSBs)/Money Value Transfer Services (MVTSs)?	INO INC.
10 -15	, , , , , , , , , , , , , , , , , , , ,	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
	, ,	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No
19 a1h3	PSPs	Yes

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes	•
19 b	Cross-Border Bulk Cash Delivery	No	
19 с	Cross-Border Remittances	No	
19 d	Domestic Bulk Cash Delivery	No	
19 e	Hold Mail	No	
19 f	International Cash Letter	No	
19 g	Low Price Securities	No	
19 h	Payable Through Accounts	No	
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No	•
19 i1	If Y , please select all that apply below?		
19 i2	Third Party Payment Service Providers	No	
19 i3	Virtual Asset Service Providers (VASPs)	No	
19 i4	eCommerce Platforms	No	
19 i5	Other - Please explain		
19 j	Private Banking	Both	
19 k	Remote Deposit Capture (RDC)	No	
19 I	Sponsoring Private ATMs	No	
19 m	Stored Value Instruments	No	
19 n	Trade Finance	Yes	
19 o	Virtual Assets	No	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:		
19 p1	Check cashing service	No	
19 p1a	If yes, state the applicable level of due diligence	No due diligence (Not required)	
19 p2	Wire transfers	No	
19 p2a	If yes, state the applicable level of due diligence	No due diligence (Not required)	
19 p3	Foreign currency conversion	Yes	
19 p3a	If yes, state the applicable level of due diligence	Identification and verification	
19 p4	Sale of Monetary Instruments	No	
19 p4a	If yes, state the applicable level of due diligence	No due diligence (Not required)	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Payment of utilities - Identification and verification; Cash deposit on other customer accounts - Identification and verification; Cash deposit for payment of other customers loan installment - Identification and verification; Prescoring for a loan facility - Identification and verification	
19 q	Other high-risk products and services identified by the Entity (please specify)		
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Please select	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NOT THE CASE	
21	If appropriate, provide any additional information/context to the answers in this section.		
3. AML, C	TF & SANCTIONS PROGRAMME		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the		
	following components:		
22 a	Appointed Officer with sufficient experience/expertise	Yes	
22 b	Adverse Information Screening	Yes	
22 c	Beneficial Ownership	Yes	
22 d	Cash Reporting	Yes	
22 e	CDD	Yes	
22 f	EDD	Yes	
22 g	Independent Testing	Yes	
22 h	Periodic Review	Yes	
22 i	Policies and Procedures	Yes	
22 j	Policies and Procedures PEP Screening	Yes	
22 j 22 k	Policies and Procedures PEP Screening Risk Assessment	Yes Yes	
22 j	Policies and Procedures PEP Screening	Yes	

Training and Education   Ves	22 m	Suspicious Activity Reporting	Yes	
AMIL CFF & Sanctions policy approved at latest an analyty by the Source of committee? If N, describe your practice of Outcotton 20.  25 Does the Edity and CFF & Sanctions policy approved at latest annually by the Board or equivalent Senior Management Committee? If N, describe your practice of Outcotton 20.  26 Does the Edity was third parties to carry out any common or committee or the senior of the Source of CFF & Sanctions programme?  26 Does the Edity was third parties to carry out any common or committee of the Source of CFF & Sanctions programme?  27 Does the entity have a whitelisticitiver policy?  28 Confirm that all responses provided in the above Section are representative of all the LES branches  28 a if N, charty-which questions the differences relate to any the proposed of the branches that this application of the branches that this application of the branches that this application of the provention of the CFF & Sanctions of CFF & Sancti				
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Page 1	24	at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice	Yes	•
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reporting on the status of the ABC programme?  38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  38 If N, provide the date when the last ABC EWRA was completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Yes  Yes  40 Potential liability created by intermediaries and	36		Yes	<b>~</b>
Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Yes  Yes  Yes	37		Yes	<b>T</b>
38 a If N, provide the date when the last ABC EWRA was completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and	38	Has the Entity's ABC Enterprise Wide Risk Assessment	Yes	<b>~</b>
is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and	38 a	If N, provide the date when the last ABC EWRA was		
components detailed below:  40 a Potential liability created by intermediaries and		is the net result of the controls effectiveness and the inherent risk assessment?	Yes	<b>~</b>
			Yes	<b>~</b>
	40 a	, ,	Yes	<b>V</b>

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No	•
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	•
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	•
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	<b>~</b>
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	•
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	No	
42 b	1st Line of Defence	Yes	
42 c	2nd Line of Defence	Yes	
42 d	3rd Line of Defence	Yes	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	<b> </b>
42 f	Non-employed workers as appropriate (contractors/consultants)	No	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	lacksquare
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<b>V</b>
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.	Basic training available to all employees is also available to Management board members (Mi starting with this year a dedicated session for MB and SB related ABC will be delivered during annual training provided to those bodies.  Mandatory ABC contractual provisions were implemented, contractors must comply with BCR rules related ABC available on public website.	
5. AML. 0	CTF & SANCTIONS POLICIES & PROCEDURES		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	
46 b	Terrorist financing	Yes	$\equiv$
46 c	Sanctions violations	Yes	
47	Are the Entity's policies and procedures updated at least annually?	Yes	$\overline{\mathbf{v}}$
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	
48 a1	If Y, does the Entity retain a record of the results?	Yes	
48 b	EU Standards	Yes	
48 b1	If Y, does the Entity retain a record of the results?	Yes	
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<b>~</b>
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<b> </b>
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<b>T</b>
49 d	Prohibit accounts/relationships with shell banks	Yes	
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	<b>V</b>
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<b> </b>
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	<b>V</b>
40 h		<b>.</b>	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	•

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	•
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	•
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	•
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	•
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	<b>—</b>
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	•
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	<b>T</b>
51 a	If Y, what is the retention period?	5 years or more	•
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53	If appropriate, provide any additional information/context to the answers in this section.		
6 AML CT	FF & SANCTIONS RISK ASSESSMENT		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	
54 b	Product	Yes	
54 c	Channel	Yes	$\mathbf{M}$
54 d 55	Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes	
55 a	Transaction Monitoring	Yes	
55 b	Customer Due Diligence	Yes	
55 c	PEP Identification	Yes	
55 d	Transaction Screening	Yes	
55 e	Name Screening against Adverse Media/Negative News	No	
55 f	Training and Education	Yes	
55 g	Governance	Yes	
55 h 56	Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes	<b>■</b>
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	
57 b		Yes	
	Product	103	
57 c	Channel	Yes	
57 c 57 d	Channel Geography		
57 c 57 d 58	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Yes	
57 c 57 d 58	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes	
57 c 57 d 58 58 a 58 b	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes Yes Yes	
57 c 57 d 58	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes	

	T	
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	Related to question 55 e kindly note that manual checks are performed against adverse Media/Negative News and relavant information is saved in core banking.
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	Tes
65 a	Ultimate beneficial ownership	V
		Yes
65 a1	Are ultimate beneficial owners verified?	Yes 🔽
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	PEP status, NFTF (non face-to-face) on boarding, transactional volume, NPO's etc.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No V
68 a	If Y, is this at:	
68 a1	Onboarding	No 🔽
68 a2	KYC renewal	No 🖃
68 a3	Trigger event	No 🖃
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	In some cases, the business relationship manager may visit the customer on site, but not related with the risk associated with the customer (especially for the clients who request a loan facility from the bank)
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

CO - O	T-1	Iv	
69 a3	Trigger event	Yes	
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Manual	<b>V</b>
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?		•
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Automated	
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	<b>—</b>
74 a	If yes, select all that apply:		
74 a1	Less than one year	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	$\blacksquare$
74 a4	5 years or more	Yes	
74 a5	Trigger-based or perpetual monitoring reviews	Yes	
74 a6	Other (Please specify)		
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	•
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
76 a	Arms, defence, military	Always subject to EDD	
76 b	Respondent Banks	EDD on risk-based approach	V
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	•
76 c	Embassies/Consulates	Always subject to EDD	<b>V</b>
76 d	Extractive industries	Always subject to EDD	
76 e	Gambling customers	Always subject to EDD	
76 f	General Trading Companies	EDD on risk-based approach	
76 g	Marijuana-related Entities	Prohibited	<b>T</b>
76 h	-		
	MSB/MVTS customers	Always subject to EDD	
76 i	Non-account customers	Do not have this category of customer or industry	
76 j	Non-Government Organisations	Always subject to EDD	V
76 k	Non-resident customers	EDD on risk-based approach	
76 I	Nuclear power	Always subject to EDD	
76 m	Payment Service Providers	Always subject to EDD	
76 n	PEPs	Always subject to EDD	
76 o	PEP Close Associates	Always subject to EDD	
76 p	PEP Related	Always subject to EDD	
76 q	Precious metals and stones	Always subject to EDD	<b>T</b>
76 r	Red light businesses/Adult entertainment	Always subject to EDD	
76 s	ŭ		
	Regulated charities	Always subject to EDD	
76 t	Shell banks	Prohibited	<b>T</b>
76 u	Travel and Tour Companies	No EDD/restriction or prohibition	V
76 v	Unregulated charities	Prohibited	V
76 w	Used Car Dealers	Always subject to EDD	
76 x	Virtual Asset Service Providers	Prohibited	
76 y	Other (specify)		
77	If restricted, provide details of the restriction	Only local and state owned entities involved in arms, defence and military field are allowed. Approvals for products and transactions.	
78	Does EDD require senior business management and/ or compliance approval?	Yes	<b>V</b>

	Tank a second	_	
78 a	If Y indicate who provides the approval:	Both	
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes	•
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	•
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	▼
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
82	If appropriate, provide any additional information/context to the answers in this section.	Not the case	
8. MONIT	ORING & REPORTING		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated	•
84 a	If manual or combination selected, specify what type of transactions are monitored manually		
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools	•
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	NETREVEAL	
84 b2	When was the tool last updated?	< 1 year	▼
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year	<b>V</b>
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	•
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	•
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes	•
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	•
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	<b>V</b>
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<b>T</b>
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.	Not the case	
9. PAYME	I NT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group	., п	
	Payment Transparency Standards?	Yes	

	1=		
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
02 2	· ·	V	_
93 a	FATF Recommendation 16	Yes	
93 b	Local Regulations	Yes	
93 b1	If Y, specify the regulation	Regulation no. 4/2005 regarding foreign exchange regime with further modifications. Emergency Ordinance nr. 113/2009 regarding payment services. 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	
93 с	If N, explain		
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes	•
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes	•
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<b>T</b>
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
97	If appropriate, provide any additional information/context to the answers in this section.	Not the case	
10. SANO	CTIONS		
98	Does the Entity have a Sanctions Policy approved by		
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes	•
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes	•
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes	•
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	•
102	What is the method used by the Entity for sanctions screening?	Automated	lacksquare
102 a	If 'automated' or 'both automated and manual' selected:		_
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	NetReveal/CETS (Compliance enhanced transaction system - a screening/sanction tool used Erste Group entities).	by all
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year	•
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes	•
104	What is the method used by the Entity?	Automated	
	<u> </u>		

Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	•
Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	
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	$\blacksquare$
Office of Financial Sanctions Implementation HMT (OFSI)	Not used	▼
	Used for screening customers and beneficial owners and for filtering transactional data	
Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	
Other (specify)		
When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
Customer Data	Same day to 2 business days	
Transactions	Same day to 2 business days	
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	•
Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
If appropriate, provide any additional information/context to the answers in this section.	Not the case	
IG & EDUCATION		
Does the Entity provide mandatory training, which includes:		
Identification and reporting of transactions to government authorities	Yes	
Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•
Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	•
Conduct and Culture	No	
Fraud	Yes	
Is the above mandatory training provided to:		
Board and Senior Committee Management	Yes	
	Yes	
	Yes	
been outsourced	No	<b> </b>
, , , , , , , , , , , , , , , , , , , ,		
Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	•
<u> </u>		
Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	
	Yes Annually	
	programme to ensure that complete data for all transactions are subject to sanctions screening?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:  Consolidated United Nations Security Council Sanctions List (UN)  United States Department of the Treasury's Office of Foreign Assets Control (OFAC)  Office of Financial Sanctions Implementation HMT (OFSI)  European Union Consolidated List (EU)  Lists maintained by other G7 member countries  Other (specify)  When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:  Customer Data  Transactions  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?  Confirm that all responses provided in the above Section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  G & EDUCATION  Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  3rd Line sof Defence  3rd Line of Defence  3rd Line sof Defence  3rd Line of Defence  3rd Lin	programme to ensure that complete data for all variansactions are subject to senctions screening?  Select the Senctions Lists used by the Entity in its senctions accessing processes:  Consolidated United Nations Security Council Consolidated United Nations Individual Conference of Proteins Assess Control (CPAC)  United States Department of the Treasury's Office of Proteins Assess Control (CPAC)  Office of Financial Sanctions implementation HMT (OFS)  Corporated Senctions Implementation HMT (OFS)  European Union Consolidated List (EU)  Lists manificated by other G7 member countries  Other (specify)  When regulatory authorities make updates to their Senctions Islat, now many business days before the entity updates their access manual andor automated societing systems against.  Customer Data  Yes Sanctions Islat, now many business days before the entity updates their access manual andor automated societing systems against.  Customer Data  Yes Sanctions  Does the Entity have a physical presence, uptractical control of the CS branches subsidieries, or representative offices located in countries/regions against which UK, CPAC, OFS, EU or G7 member countries have second competing unadering against which UK, CPAC, OFS, EU or G7 member countries have second competing unadering a series of all the LES branches.  If appropriate, provide any additional information context to the answers in this section.  Provide Entity provide any additional information context to the answers in this section.  International and apporting of transactions to go work to the services of ferred when the services of ferred the controlling and services of ferred the controlling

and the branchives that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  It also the Entity have a program wide risk based Qualify Assurance programs be frainfact clime (separate from the independent Audit function)?  It also be the Entity have approgram wide risk based Compliance Testing process (separate from the independent Audit function)?  It also confirms that all responses provided in the above Section are representative of all the LES branches III and the branchives that this applies to.  If N, clarify winch questions the difference's relate to and the branchives that this applies to.  If appropriate, provide any additional information/context to the enswers in this section.  It addition is inspections by the government, and the provides and provides and provides and sections and additional information-context to the enswers in this section.  In addition is inspections by the government, and the provides and provides and provides and additional information and the enswers in this section.  In addition is inspections by the government, and the provides and provides and provides on a regulat bases of the first play have an internal audit function, a tealing function or other independent third party, or both, that assesses ECC AMIL, CTF, ABC, Fraud and Sanctions programme by the following:  It also be the internal audit function or other independent third party occurs the following areas:  It also be the internal audit function or other independent third party occurs the following areas:  It also be the internal audit function or other independent third party occurs the following areas:  It also be the internal audit function or other independent third party occurs the following areas:  It also becomes a substance and additional approximation and assessed for adequacy and completions and assessed for adequacy and completions.  It also becomes a substance and assessed for adequacy and completions and assessed for adequacy and completions.			<u></u>
Information/context to the answers in this section.  112. QUALITY ASSURANCE (COMPLIANCE TESTING)  113. Does the Entity have a program wide risk based Cabilly Assistance programs may be also based Cabilly Assistance programs may be also based Cabilly Assistance programs may be also be called the complete of the program wide risk based Compliance Testing promose provided in the above Section are representative of all the LE branches Section are representative of all the LE branches and the branches that this applies to .  113. AUDIT In addition to inspections by the government supervision/solutionised to the enswers in this section.  124. AUDIT In addition to inspections by the government supervision/solutionised to the enswers in this section.  125. AUDIT In addition to inspections by the government supervision/solutionised to the enswers in this section.  126. Provides in the Entity have a complete or the complete of the complete or the complet	115 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
Does the Entity have a program wide risk based   Quality Assurance programs for financial crime   Legislaria from the independent Audit function)?   Ves	116		Not the case
Does the Entity have a program wide risk based   Quality Assurance programs for financial crime   Legislaria from the independent Audit function)?   Ves	10.01111	LA COURT AND TO THE TOTAL OF	
Quality Assurance programme for financial crime (separate for the Independent Audit Unclose)?  118 Does the Ently have a program wide risk based Compliance Testing process (separate from the Independent Audit Unclose)?  119 Confirm that all responses provided in the above Section are representative of all the LE's branches  119 a If No Cariffy which quastes the difference's relate to and the branchies that this applies to.  120 If appropriate, provide any additional information/context to the district of the University of the Cariffy and the district of the University of the Cariffy and the Independent Supervisions (spiral to June 200 A).  13. AUDIT  121 In addition to inspections by the government supervisions regulators, does the Entity have an information of the Cariffy have an information and structure of the Cariffy have an information of the Cariffy have an information and structure of the Cariffy have an information of the Cariffy have and information of the Cariffy have a informati			
Compliance Testing process (separate from the nodependent Audit Institution)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches 119 a    18 N. Clarify which questions the difference's relate to and the branches that this applies to the section.  18 AUDIT  19 In addition to inspecifions by the government supervisors' application, does the Entity have an information and thraction, a steply fundior order FCC AML, CTF. ABC, Fraud and Sanctions policies and practices on a regular base?  19 How offers in the Entity subtlet on its AML, CTF. ABC, Fraud and Sanctions policies and practices on a regular base?  19 AML, CTF. ABC, Fraud and Sanctions policy and procedures to the process of the p		Quality Assurance programme for financial crime	Yes
Section are representative of all the LE's branches  If appropriate, provide any additional information-to-the that this applies to.  If appropriate, provide any additional information-to-the to the answers in this section.  If appropriate, provide any additional information-to-the to the answers in this section.  If addition to inspection is by the government information in the provided and provided any additional information-to-the total that the control independent independent integration you follow that a session and produces on a regular basis?  If you often is the Entity addited on its AML_CTF_ABC, Fraud and Sanctions projection and produces on a regular basis?  If you often is the Entity addited on its AML_CTF_ABC, Fraud and Sanctions programme by the following:  If you often is the Entity addited on its AML_CTF_ABC, Fraud and Sanctions programme by the following:  If you often is the Entity addited on its AML_CTF_ABC, Fraud and Sanctions programme by the following:  If you often is the Entity addited on the following:  If you often is the Entity addited on its AML_CTF_ABC, Fraud and Sanctions prolicy and proceedures to increase and the solicy areas.  If you often is the Entity addited on the control in the proceedures to the proceedures to the proceedures.  If you often is the Entity addited on the control in the proceedures to the	118	Compliance Testing process (separate from the	Yes
and the branchies that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  121  In addition to inspections by the government.  121  In addition to inspections by the government.  122  In addition to inspections by the government.  123  In addition to inspections by the government.  124  In addition to inspections by the government.  125  In addition to inspections by the government.  126  In addition to inspections by the government.  127  In addition to inspections by the government.  128  In addition to inspection by the government.  129  In addition to inspection by the government.  129  In addition to inspection by the government.  120  In addition to inspection by the government.  120  In addition to inspection by the government.  121  In addition to inspection by the government.  122  In the government of the governmen	119		Yes
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In addition to inspections by the government supervisors/regulations, does the Entity have an internal audit function, a testing function or other independent intrior party, or both, that assesses FCC AML, criter, and and Sanctions policies and practices, and an experiment of the party of the party, or both, that assesses FCC AML, criter, and so are gular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  123 be the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  124 Lotes the Internal Audit Department Yearly  125 be best the Internal Audit Department Yearly  126 best the Internal Audit Department Yearly  127 best the Following and Sanctions policy and procedures Wide Risk Assessment Yes  128 best the Internal Audit Department Yes  129 convention of the Internal Audit Department Yes  121 convention of the Internal Audit Department Yes  122 convention of the Internal Audit Department Yes  123 convention of the Internal Audit Department Yes  124 Are adverse findings from Internal & external audit tracked to completions and assessed for adequacy and conventions of the Internal Audit Department Yes  125 confirm that all responses provided in the above section are representative of all the Leb branches Yes  126 lif appropriate, provide any additional information/context to the answers in this section.  126 lif appropriate, provide any additiona	120		Not the case
In addition to inspections by the government supervisors/regulations, does the Entity have an internal audit function, a testing function or other independent intrior party, or both, that assesses FCC AML, criter, and and Sanctions policies and practices, and an experiment of the party of the party, or both, that assesses FCC AML, criter, and so are gular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  123 be the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  124 Lotes the Internal Audit Department Yearly  125 be best the Internal Audit Department Yearly  126 best the Internal Audit Department Yearly  127 best the Following and Sanctions policy and procedures Wide Risk Assessment Yes  128 best the Internal Audit Department Yes  129 convention of the Internal Audit Department Yes  121 convention of the Internal Audit Department Yes  122 convention of the Internal Audit Department Yes  123 convention of the Internal Audit Department Yes  124 Are adverse findings from Internal & external audit tracked to completions and assessed for adequacy and conventions of the Internal Audit Department Yes  125 confirm that all responses provided in the above section are representative of all the Leb branches Yes  126 lif appropriate, provide any additional information/context to the answers in this section.  126 lif appropriate, provide any additiona	13. AUDIT		
Fraud and Sanctions programme by the following:  122 a Internal Audit Department  123 b External Third Party  124 Does the Internal audit function or other independent third party cover the following areas:  125 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  126 Enterprise Wide Risk Assessment  127 Yes  128 Destruction AML, CTF, ABC, Fraud and Sanctions policy and procedures  129 b Enterprise Wide Risk Assessment  129 c Governance  120 Governance  121 yes  122 Name Screening & List Management  123 c Nore Screening & List Management  124 Yes  125 a Suspicious Activity Filing  126 Yes  127 Transaction Monitoring  127 Yes  128 Does the Entity have a dedicated team responsible  129 Transaction Screening inductional information information/context to the answers in this section.  129 Not the Case  120 Not the Case  120 Not the Case  121 If appropriate, provide any additional information/context to the answers in this section.  129 Does the Entity have a dedicated team responsible  120 Does the Entity have a dedicated team responsible  120 Not the Case  121 Not the Case  122 Not the Case  123 Destruction Screening Inductional information/context to the answers in this section.		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	Yes
External Third Party	122		
Does the internal audit function or other independent third party cover the following areas:  123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  123 b Enterprise Wide Risk Assessment  123 c Governance  123 c KYC/CDD/EDD and underlying methodologies  123 e Name Screening & List Management  123 f Reporting/Metrics & Management I yes  123 g Suspicious Activity Filing  123 g Suspicious Activity Filing  123 h Technology  123 h Tensaction Screening including for sanctions  123 g Transaction Screening including for sanctions  123 g Transaction Screening including for sanctions  123 g Transaction Screening including for sanctions  124 h Transaction Screening including for sanctions  125 c Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, Clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible  129 Does the Entity have a dedicated team responsible  120 Does the Entity have a dedicated team responsible  120 Does the Entity have a dedicated team responsible		•	
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procedures    Procedures   Proc		third party cover the following areas:	
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123 d KYC/CDD/EDD and underlying methodologies Yes  123 e Name Screening & List Management Yes  123 f Reporting/Metrics & Management Information Yes  123 g Suspicious Activity Filing Yes  123 h Technology Yes  123 i Transaction Monitoring Yes  123 i Transaction Screening including for sanctions Yes  123 i Transaction Screening including for sanctions Yes  123 i Transaction Screening including for sanctions Yes  123 i Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  Not the case  127 fooes the Entity have policies in place addressing fraud risk?  Yes  128 Does the Entity have a dedicated team responsible  128 Does the Entity have a dedicated team responsible		•	
123 e   Name Screening & List Management   Yes			
Reporting/Metrics & Management Information   Yes			
123 h Technology Yes			
Transaction Monitoring Yes Transaction Screening including for sanctions Yes Training & Education Other (specify)  The Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  Not the case  If A poss the Entity have policies in place addressing fraud risk?  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye	123 g	Suspicious Activity Filing	Yes
123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  126 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible			
123 k Training & Education Yes  123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible		_	
124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  Not the case  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible		, , , , , , , , , , , , , , , , , , ,	
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section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	124	tracked to completion and assessed for adequacy	Yes
and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  Not the case  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  Yes  128 Does the Entity have a dedicated team responsible	125		Yes
information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	125 а	If N, clarify which questions the difference/s relate to	
127 Does the Entity have policies in place addressing fraud risk?  Yes  128 Does the Entity have a dedicated team responsible	126		Not the case
127 Does the Entity have policies in place addressing fraud risk?  Yes  128 Does the Entity have a dedicated team responsible	14. FRAU	D	
	127	Does the Entity have policies in place addressing fraud risk?	Yes
	128		Yes

130	Does the Entity have real time monitoring to detect fraud?	Yes
	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes ▼
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	Not the case
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)  Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)  BANCA COMERCIALA ROMANA SA  (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financ	· · · · · · · · · · · · · · · · · · ·	e, regulations and standards in all of the jurisdictions in which it does business and holds accounts.  The purpose of the protect its reputation and to meet its reputation.
The Financ	. , , , ,	ng parties to transactions in international payments and has adopted/is committed to adopting these
standards.		
standards. The Financ		ly with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. will be updated no less frequently than every eighteen months.
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standards. The Financ The inform The Financ I, ANDRE the answer Institution. I, LINKA Wolfsberg	cial Institution further certifies it complies with / is working to compliation provided in this Wolfsberg CBDDQ will be kept current and vicial Institution commits to file accurate supplemental information or I IONUT POPESCU  (Global Head of the provided in this Wolfsberg CBDDQ are complete and correct to the correct to the complete and correct to the correct to t	will be updated no less frequently than every eighteen months.  In a timely basis.  In