## the Wolfsberg Group

Financial Institution Name: Location (Country):

Southeast Asia Commercial Joint Stock Bank Vietnam

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.

this questionnaire  SeABank has no foreign branches  Full Legal (Registered) Address  1s8 Tran Quang Khai Street, Ly Thai To Ward, Hoan Kiem District, Ha Noi, Viet Nam  Full Primary Business Address (if different from above)  Date of Entity incorporation/establishment  Select type of ownership and append an ownership charf if available  Select type of ownership and append an ownership charf if available  If Y, include the exchange traded on and ticker symbol  If Y, include the exchange traded on and ticker symbol  Member OwnedMutual  Select type of ownership and append an ownership charf if available  Member OwnedMutual  No  Member OwnedMutual  Fy provide details of shareholders or ultimate beneficial owners with a holding of 10% or more  Add If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more  The provide the pane of the relevant branch/es which operate under an Ottons Bening License (PR)  Try, provide the name of the relevant branch/es which operate under an OSL  No  Services only through colline channels?  No  No  Services only through online channels?  No  Nome of primary financial regulator/supervisory authority  State Bank of Vietnam (SBV)	No #	Question	Answer
Southeast Asia Commercial Joint Stock Bank  Append a list of foteign branches which are covered by file questionnaire  SoABank has no foreign branches  198 Tran Quang Khal Street, Ly Thai To Ward, Hoan Kiem District, He Not, Viet Nam  198 Tran Quang Khal Street, Ly Thai To Ward, Hoan Kiem District, He Not, Viet Nam  Full Primary Business Address (if different from above)  Date of Entity incorporation/establishment  Solice type of ownership and append an ownership chan is avoidable  Business (if a private in the exchange fraded on and ticker symbol  A I I'V, indicate the exchange fraded on and ticker symbol  Business (if a private) Owned  Description of State Governd by 25% or more  Incomment Stock Exchange (HOSE)  Symbol SSB  Does the Entity or any of its tranches, operate under an No  Does the Entity, or any of its tranches, operate under an Offshippe Bankins License (OBLY)  Does the Bank have a Virtual Bank License or provide services only through climic channels?  Does the Bank have a Virtual Bank License or provide services only through climic channels?  Name of primary financia regulator/supervisory authority  Provide Legal Entity Identifier (LE) if available  Provide the full legal name of the ultimate parent (fighterent from the Etitiv competition to the COE)  Gifferent from the Etitiv competition the DOE)	1. ENTIT		
this questionnaire  SeABank has no foreign branches  Full Legal (Registered) Address  198 Tran Quang Khal Street, Ly Thei To Word, Hoan Kiem District, Ha Noi, Vict Nam  Full Primary Business Address (if different from above)  Date of Entity incorporation/establishment  Select type of ownerably and append an ownership chant if available  Salect type of ownerably and append an ownership chant if available  A Publicy Traded (25% of shares publicy traded)  Full fry, include the exchange traded on and ticker symbol  Se at If Y, include the exchange traded on and ticker symbol  Se Covernment or State Owned by 25% or more  No  First Fry provide details of shareholders or utilimate beneficial owners with a holding of 10% or more  We of the Entity, or any of its branches, operate under an No  Offshore Bankharu License (OSL I)  Does the Entity, or any of its branches, operate under an No  Offshore Bankharu License (OSL I)  Does the Entity, or any of its branches, operate under an No  Offshore Bankharu License (OSL I)  Oces the Bank have a Virtual Sank License or provide services coult impact under an OSL  Does the Bank have a Virtual Sank License or provide services coult impact under an OSL  State Bank of Vietnam (SBV)  State Bank of Vietnam (SBV)	1	Full Legal Name	Southeast Asia Commercial Joint Stock Bank
188 Tran Quang Khai Street, Ly Thai To Ward, Hoan Kiem District, Ha Noi, Viet Nam  4 Full Primary Business Address (if different from above)  5 Date of Entity incorporation/establishment  5 Select type of ownership and append an ownership chart if available  6 Select type of ownership and append an ownership chart if available  7 Publicly Traded (25% of shares publicly traded)  8 a Publicly Traded (25% of shares publicly traded)  8 b Member Owned/Mutual  8 No  9 Government of State Owned by 25% or more  8 No  9 Government of State Owned by 25% or more  No  10 Privately Owned  9 If Y, provide details of shareholders or utilimate beneficial owners with a holding of 10% or more  9 W of the Entity's total shares composed of bearer shares  9 W of the Entity, or any of its branches, operate under an Offshore Banking Ucense (OBL)?  10 Nome of primary financial regulator/supervisory authority  State Bank Nov Vietnam (SBV)  State Bank of Vietnam (SBV)	2		SeABank has no foreign branches
Date of Entity incorporation/establishment  Select type of ownership and append an ownership chart if available  If a Publicity Traded (25% of shares publicly traded)  If Y, indicate the exchange traded on and tuker symbol  If Y, indicate the exchange traded on and tuker symbol  If Y, indicate the exchange traded on and tuker symbol  If Y, indicate the exchange traded on and tuker symbol  If Y, indicate the exchange traded on and tuker symbol  If Y, indicate the exchange traded on and tuker symbol  If Y, invited the trade (No. 1)  If Y provide details of shareholders or ultimate beneficial owners with a holding of 10% or more beneficial owners wi	3	Full Legal (Registered) Address	198 Tran Quang Khai Street, Ly Thai To Ward, Hoan Kiem District, Ha Noi, Viet Nam
25/if March 1994  Select type of ownership and append an ownership chart if available  Publicy Traded (25% of shares publicy traded)  If Y, Indicate the exchange traded on and ticker symbol  If Y, Indicate the exchange traded on and ticker symbol  Member OwnedfMutual  No  Comment or State Owned by 25% or more  A Grovernment or State Owned by 25% or more  If Y, provide the full legal name of the utilimate parent (if different from the Entity completing the DOQ)  State Bank of Vietnam (SBV)  State Bank of Vietnam (SBV)  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the utilimate parent (if different from the Entity completing the DOQ)	4	Full Primary Business Address (if different from above)	
if a valiable 6 a Publicly Traded (25% of shares publicly traded) 6 a1 Publicly Traded (25% of shares publicly traded) 6 a1 If Y, indicate the exchange traded on and ticker symbol  5 b Member Owned/Mutual No 6 c Government or State Owned by 25% or more No 6 d Privately Owned No 6 d1 Privately Owned No 6 d1 If Y, provide details of shareholders or utilimate beneficial owners with a holding of 10% or more 7 % of the Entity's total shares composed of bearer shares O% 8 Does the Entity, or any of its branches, operate under 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 provide services only through online channels? Name of primary financial regulator/supervisory authority State Bank of Vietnam (SBV)  11 Provide Legal Entity Identifier (LEI) if available 254900YPVZXJCMTIN552	5	Date of Entity incorporation/establishment	25th March 1994
If Y, Indicate the exchange traded on and ticker symbol   Symbol: SSB	6		
If Y, Indicate the exchange traded on and ticker symbol   Symbol: SSB	6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 d Privately Owned No 6 d Privately Owned No 6 d Privately Owned No 1 If Y, provide details of shareholders or utilimate beneficial owners with a holding of 10% or more  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)? 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 provide services only through online channels? 10 Name of primary financial regulator/supervisory authority 11 Provide Legal Entity Identifier (LEI) if available 254900YPVZXJCMTIN552  12 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)		If Y, indicate the exchange traded on and ticker	
6 d Privately Owned No 6 d Privately Owned No 6 d Privately Owned No 1 If Y, provide details of shareholders or utilimate beneficial owners with a holding of 10% or more  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)? 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 provide services only through online channels? 10 Name of primary financial regulator/supervisory authority 11 Provide Legal Entity Identifier (LEI) if available 254900YPVZXJCMTIN552  12 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	6 b	Member Owned/Mutual	No
6 d1 Privately Owned No 6 d1 If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more  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)?  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 provide services only through online channels?  10 Name of primary financial regulator/supervisory authority  State Bank of Vietnam (SBV)  11 Provide Legal Entity Identifier (LEI) if available  254900YPVZXJCMTIN552			
If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more			
8 Does the Entity, or any of its branches, operate under 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 provide services only through online channels? 10 Name of primary financial regulator/supervisory authority State Bank of Vietnam (SBV)  11 Provide Legal Entity Identifier (LEI) if available  254900YPVZXJCMTIN552		If Y, provide details of shareholders or ultimate	
Offshore Banking License (OBL)?  If Y, provide the name of the relevant branch/es which operate under an OBL  Does the Bank have a Virtual Bank License or provide services only through online channels?  Name of primary financial regulator/supervisory authority  State Bank of Vietnam (SBV)  Provide Legal Entity Identifier (LEI) if available  254900YPVZXJCMTIN552	7	% of the Entity's total shares composed of bearer shares	
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services only through online channels?  Name of primary financial regulator/supervisory authority  State Bank of Vietnam (SBV)  11 Provide Legal Entity Identifier (LEI) if available  254900YPVZXJCMTIN552  12 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	8 a		
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254900YPVZXJCMTIN552  12 Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	10	Name of primary financial regulator/supervisory authority	State Bank of Vietnam (SBV)
different from the Entity completing the DDQ)	11	Provide Legal Entity Identifier (LEI) if available	254900YPVZXJCMTIN552
	12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

	Jurisdiction of licensing authority and regulator of	
	ultimate parent	eff
	Since the Market -	N/A SYNTHING
EAST-A		0,0010
4	Select the business areas applicable to the Entity	
4 a	Retail Banking	Yes
4 b	Private Banking	No suspect the second s
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f		
	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
4 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	The Control of the Co
	, and the second	
		and the same and thought and the same and the
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 resident in a	No months (bosons 5 lays)
	different jurisdiction to the location where bank services are provided)	Line Cr. Lance and Common and Revi
15 a	If Y, provide the top five countries where the non- resident customers are located.	in white med framely A terroris A surround from motors
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 Section are representative of all the LE's branches.	Yes FEEDER FEED
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Parity of Epimonia and Emiliary Lane of Computer, No. 1997, Carlotte.
18	If appropriate, provide any additional information/context to the answers in this section.	ATTS The property of a control
		21 × 11 mm/4
2 PRODI	1	
19	JCTS & SERVICES  Does the Entity offer the following products and services:	
19	JCTS & SERVICES	No
9 9 a	JCTS & SERVICES  Does the Entity offer the following products and services:	
9 9 a 19 a1	JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking	No
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	No
9 a 1 9 a 1 a 1 9 a 1 b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
19 a 19 a1 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?	No
19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?	No
19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships	No
19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity downstream relationships with foreign banks? Does the Entity forer Correspondent Banking services to regulated Money Services Businesses	No
9 a1 9 a1 9 a1 9 a1 6 a1 6	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No
9 a 9 a 1 9 a 1 a 9 a 1 b 9 a 1 c 9 a 1 d 9 a 1 e 9 a 1 f 9 a 1 g 9 a 1 h	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No
9 a 9 a 1 9 a 1 a 1 b 9 a 1 c 9 a 1 d 9 a 1 e 9 a 1 f 9 a 1 g 9 a 1 h 9 a 1 h 1	Does the Entity offer Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MYTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs	No
9 a 9 a 1 9 a 1 a 1 a 1 a 1 a 1 a 1 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs	No
19 a 19 a 19 a 19 a 19 a 19 a 19 a 10 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs  PSPs  Does the Entity have processes and procedures in place to identify downstream relationships with	No
19 a 19 a 19 a 19 a 19 a 19 a 19 a 19 a 19 a 19 a 10 a 19 a 10 a	Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs PSPs  Does the Entity have processes and procedures in place to identify downstream relationships with MSBs MVTSs	
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19 a 19 a 10 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs PSPs  Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?  Cross-Border Bulk Cash Delivery  Cross-Border Remittances	
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19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f 19 a1f 19 a1h 19 a1h 19 a1h1 19 a1h2 19 a1h3 19 a1i	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity forer Correspondent Banking services to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs  MVTSs PSPs  Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?  Cross-Border Bulk Cash Delivery  Cross-Border Remittances	No  No  No  No  No  No  Yes

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Mr.

19 g	EGW 1 fice decarries	No No
19 h	Payable Through Accounts  Payment services to non-bank entities who may then	NO
19 i	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	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	No No
19 k	Remote Deposit Capture (RDC)	No No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments Trade Finance	Yes
19 n 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	
10 n1	applicable level of due diligence; Check cashing service	No
19 p1 19 p1a	If yes, state the applicable level of due diligence	
19 p1a	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
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	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Other services to walk-in customers: Bill payment services (eg. Electric Bill, Water Bill), Government Tax payment services, Cash deposit into another account. Customers are required to provide identification documents for verification and SeABank will retain a copy of all related documents for at least 5 years. All their information are screened against blacklists or sanction lists and subject to transactions monitoring.
19 q	Other high-risk products and services identified by the Entity (please specify)	Digital account opening for Individual and Corporate Customers.  SeABank will monitors these accounts on the next working day to detect and close accounts with insufficient KYC information or suspicious signs.
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	Q 19p3: SeABank applies a threshold for foreign currency conversion transactions for walk-in customers which only allow them to buy/sell a limited amount in cash.
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 Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review Policies and Procedures	Yes
22 i	PEP Screening	Yes
22 j	Risk Assessment	Yes
22 k	Sanctions	Yes
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 0	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.  Does the Board receive, assess, and challenge regular	Yes

12/ NO HO 10/0/

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26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No Community and Market
26 a	If Y, provide further details	The Administration of the second seco
20 d	ii 1, provide further details	
		Conference control programme and the control
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes unum Ki sa unum sa
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	Wanning and the second	
29	If appropriate, provide any additional information/context to the answers in this section.	
	to the districts in this section.	ONE OF THE PARTY O
		and the second s
4. ANTI I	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Voca de la
	requirements to reasonably prevent, detect and report	Yes
31	bribery and corruption?	
J1	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes Control our to experience and the property of the property
32	Has the Entity appointed a designated officer or officers	
-	with sufficient experience/expertise responsible for	Yes Emerica Bulli to invest and course any in the page 21
22	coordinating the ABC programme?	THE THE PARTY OF T
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC	Yes Allemoniani Marannii II ag il
	programme?	Tes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if	Von
	improperly intended to influence action or obtain an	Yes and a supplied the supplied of the supplined of the supplied of the supplied of the supplied of the suppli
100011111	advantage	Had note, Result be like in the course of
35 b	Includes enhanced requirements regarding	Yes
35 c	interaction with public officials? Includes a prohibition against the falsification of books	100
33 6	and records (this may be within the ABC policy or any	the second and in producting policy in property and the
	other policy applicable to the Legal Entity)?	Yes
		area liquies a survivie per spra
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	Yes
00	reporting on the status of the ABC programme?	TOTAL PROPERTY OF THE COLUMN C
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	and and the spirit of might with single
	(EVIVA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	The statement of the st
39	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	Yes
40	inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk	SERVICE MARKET STORY CONTROL S
	components detailed below:	
40 a	Potential liability created by intermediaries and other	V.
	third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and	ve
	industries in which the Entity does business, directly or through intermediaries	Yes and the second seco
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
40 4	public officials	
40 d	Corruption risks associated with gifts and hospitality,	Voc
	hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially	·
	increase the Entity's corruption risk	Yes As a service of a service and a service of a life and a life a
41	Does the Entity's internal audit function or other	
		Yes
40	Procedures?	US-31 (file)
42	Does the Entity provide mandatory ARC training to:	
42 42 a	Does the Entity provide mandatory ABC training to:  Board and senior Committee Management	Yes
	Board and senior Committee Management	

An

12 c	2nd Line of Defence	Yes
2 d		Yes
12 e	Title it to thisife associance potivities	Ma-
+2 <del>C</del>	subject to ABC risk have been outsourced	Yes
12 f	the state of the s	Yes
	(contractors/consultants)	Tes
43	E II E III I ADO to inite the tie terreted to	Yes
40	specific roles responsibilities and activities?	tes
44		Yes
7-1	are representative of all the LE's branches	Tes
44 a	If N, clarify which questions the difference/s relate to	
774	and the branch/es that this applies to.	
•11	T to the second	
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
- London Daniel Communication of the Communication	THE PROPERTY OF A PROCEDURE.	
	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
1 1000	detect and report:	
16 a	Welley Ballacing	Yes
16 b	Terrotice interioring	Yes
16 c		Yes
47	Are the Entity's policies and procedures updated at least	Yes
	annually?	The state of the s
48	Has the Entity chosen to compare its policies and	
<u></u>	procedures against:	
48 a		No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and	Yes
	fictitious named accounts	169
49 b	Prohibit the opening and keeping of accounts for	Yes
43 0	unlicensed banks and/or NBFIs	Tes
49 c	Prohibit dealing with other entities that provide	V
450	banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	Yes
45 E	services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section	Yes
431	311 designated entities	res
49 g	Prohibit opening and keeping of accounts for any of	
45 g	unlicensed/unregulated remittance agents,	Vac
	exchanges houses, casa de cambio, bureaux de	Yes
	change or money transfer agents	
49 h	Assess the risks of relationships with domestic and	
73 11	foreign PEPs, including their family and close	Yes
	associates	
49 i	Define the process for escalating financial crime risk	
731	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for	
43]	terminating existing customer relationships due to	Yes
	financial crime risk	
49 k	Define the process for exiting clients for financial	
42 V	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
491	Define the process and controls to identify and	
	handle customers that were previously exited for	Yes
	financial crime reasons if they seek to re-establish a	
	rolationship	
49 m	Outline the processes regarding screening for	V
	sanctions, PEPs and Adverse Media/Negative News	Yes
	Outline the processes for the maintenance of internal	
49 n		Yes
	"watchlists"  Has the Entity defined a risk tolerance statement or	
	I Has the Entity defined a risk tolerance statement of	Yes
50	1,125 115 2111	
50	similar document which defines a risk boundary around	100
	similar document which defines a risk boundary around	
50	similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that	Yes
51	similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that comply with applicable laws?	
51	similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that	
51	similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that comply with applicable laws?	Yes
	similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that comply with applicable laws?	

/hg

52	Confirm that all responses provided in the above Section	V
	are representative of all the LE's pranches	res control of the second of t
52 a	If N, clarify which questions the difference/s relate to	A CONTRACTOR OF THE PROPERTY O
	and the branch/es that this applies to.	Description of the control of the co
		and a setting of the form of hydronical and the first of
-		
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
		and the second of the second s
Fa and		Change of Control of the Control of
	CTF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
54 a	risk components detailed below:  Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls	
55 a	effectiveness components detailed below:	
55 b	Transaction Monitoring Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes Yes
55 e	Name Screening against Adverse Media/Negative	
	News	Yes
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	Yes
30	the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF	
	EWRA was completed.	Fortigon will be a series and the series are the series and the series and the series are the series are the series and the series are the se
		100
		College and the December of Marian and American Advantage and Americ
57	Does the Entity's Sanctions EWRA cover the inherent	
	risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls	
58 a	effectiveness components detailed below: Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	Yes
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	
oo u	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.	
7 KYC	CDD and EDD	
	CDD and EDD  Does the Entity verify the identity of the customer?	Yac
7. KYC, ( 62 63	Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when	Yes
62	Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when	Yes

Am &

64	Which of the following does the Entity gather and retain	- 1925年 - 17 18 19 19 19 19 19 19 19 19 19 19 19 19 19
	when conducting CDD? Select all that apply:	
4 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:	全体的。 19 1 19 1 19 1 19 1 19 1 19 1 19 1 19
65 a	Ultimate beneficial ownership	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	25%
00	to beneficial ownership identification?	2370
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
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)	
***	Section Control Control	
	=	
1 1 1 1 1 1 1	For high risk non-individual customers, is a site visit a	
68		No
	part of your KYC process?	
68 a	If Y, is this at:	C Table Control Contro
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other  If yes, please specify "Other"	The Completion of the Completi
68 a4a	il yes, please specify Othor	Q68: Site visit is not a mandatory requirement under Vietnam's AML law, so it is not regulated in SeABank KYC process.
	Does the Entity have a risk based approach to screening	
69	customers for Adverse Media/Negative News?	Yes
	customers for Adverse Media/14egative 14ews	
CO -	If Y, is this at:	
69 a	Onboarding	Yes
69 a1	KYC renewal	Yes
69 a2		Yes
69 a3	Trigger event  What is the method used by the Entity to screen for	
70	Adverse Media/Negative News?	Combination of automated and manual
	Does the Entity have a risk based approach to screening	
71	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
		The process of the pr
71 a	If Y, is this at:	
	If Y, is this at:	Yes
71 a1	If Y, is this at: Onboarding	
71 a1 71 a2	If Y, is this at: Onboarding KYC renewal Trigger event	Yes
71 a1 71 a2 71 a3	If Y, is this at: Onboarding KYC renewal Trigger event What is the method used by the Entity to screen PEPs?	Yes Yes
71 a1 71 a2	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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	Yes Yes Yes
71 a1 71 a2 71 a3 72	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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 Yes Yes Automated Yes
71 a1 71 a2 71 a3 72	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk	Yes Yes Yes Yes Automated
71 a1 71 a2 71 a3 72 73	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes Yes Yes Automated Yes
71 a1 71 a2 71 a3 72 73	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:	Yes Yes Yes Automated Yes
71 a1 71 a2 71 a3 72 73 74 74 a 74 a	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year	Yes Yes Yes Automated  Yes  Yes
71 a1 71 a2 71 a3 72 73 74 74 a 74 a1 74 a2	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years	Yes Yes Yes Automated  Yes  Yes  Yes
71 a1 71 a2 71 a3 72 73 74 74 a 74 a 74 a1 74 a2 74 a3	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years  3 – 4 years	Yes Yes Yes Automated  Yes  Yes  Yes  Yes
71 a1 71 a2 71 a3 72 73 74 74 a 74 a1 74 a2 74 a3 74 a4	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years  3 – 4 years  5 years or more	Yes Yes Yes Automated  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
71 a1 71 a2 71 a3 72 73 74 74 a 74 a1 74 a2 74 a3 74 a4 74 a4 74 a5	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years  3 – 4 years  5 years or more  Trigger-based or perpetual monitoring reviews	Yes Yes Yes Automated  Yes  Yes  Yes  Yes
74 74 a 74 a1 74 a2 74 a3 74 a4	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years  3 – 4 years  5 years or more	Yes Yes Yes Automated  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
71 a1 71 a2 71 a3 72 73 74 74 a 74 a1 74 a2 74 a3 74 a4 74 a4 74 a5	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years  3 – 4 years  5 years or more  Trigger-based or perpetual monitoring reviews	Yes Yes Yes Automated  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
71 a1 71 a2 71 a3 72 73 74 74 a 74 a1 74 a2 74 a3 74 a4 74 a4 74 a5	If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 – 2 years  3 – 4 years  5 years or more  Trigger-based or perpetual monitoring reviews	Yes Yes Yes Automated  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y

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The second secon			
84 b2	When was the tool last updated?	<1 year	
	the name of the vendor/tool?	The vendor's name: MIU FINANCIALTECHNOLOGY PTY LTD & TESS INNOVATION SDN BHD (TESS - MIU)	
84 b1	system or vendor-sourced tools used?  If "Vendor-sourced tool" or 'Both' selected, what is	DOUL	
84 b	If automated or combination selected, are internal	transactions during the customer lifecycle to detect qualitative factors with suspicious signs.	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Besides transaction monitoring scenarios, SeABank's Business units are responsible for monitoring	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
8. MONIT	ORING & REPORTING		
82	to the answers in this section.	Q64g&Q64h: Apply to high-risk customer Q80: Additional control:Require at least 1 higher approval level on on-boarding process, strictly monitor customer transactions, update information once a year or when SeABank knows customer information has been changed.	
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	The solution of the solution o	
81 81 a	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes Harry manifest to the second of the seco	
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No <u>Explication</u> 181	
78 a	If Y indicate who provides the approval:	Senior business management	
78	Does EDD require senior business management and/or compliance approval?	Yes	
77	If restricted, provide details of the restriction	Q76i: SeABank only provides a restricted number of products/ service to non-account customers. Please refer to Q19p & Q21 for more information.	
76 y	Other (specify)	Prohibited	
76 w 76 x	Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach	
76 v	Unregulated charities	Prohibited	
76 t	Shell banks Travel and Tour Companies	Prohibited EDD on risk-based approach	
76 s	Regulated charities	EDD on risk-based approach	
76 q 76 r	Precious metals and stones  Red light businesses/Adult entertainment	EDD on risk-based approach Prohibited	
76 p	PEP Related	Always subject to EDD	
76 o	PEPS PEP Close Associates	Always subject to EDD Always subject to EDD	
76 m 76 n	Payment Service Providers PEPs	Always subject to EDD	
76 I	Nuclear power	EDD on risk-based approach  Do not have this category of customer or industry	
76 j 76 k	Non-Government Organisations Non-resident customers	Do not have this category of customer or industry	
76 i	Non-account customers	EDD on risk-based approach	
76 g 76 h	MSB/MVTS customers	Prohibited Always subject to EDD	
76 f 76 q	General Trading Companies  Marijuana-related Entities	EDD on risk-based approach	
76 e	Gambling customers	Prohibited	
76 c	Embassies/Consulates Extractive industries	Do not have this category of customer or industry  EDD on risk-based approach	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Tay Company of the control of the co	
76 b	Respondent Banks	Restricted  Do not have this category of customer or industry	
76 a	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  Arms, defence, military		
76	and past periodic or trigger event due diligence reviews?  From the list below, which categories of customers or		

4 b3	When was the automated Transaction Monitoring	<1 year
i	application last calibrated?  Does the Entity have regulatory requirements to report	Yes
i a	suspicious transactions?  If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	Yes
6	reporting requirements?  Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
8	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
9	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a finely mapper?	Yes
0	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
0 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
1	If appropriate, provide any additional information/context to the answers in this section.	
PAYME	ENT TRANSPARENCY	
2	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
3	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
3 a	FATF Recommendation 16	Yes
3 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law 14/2022/QH15 dated 15/11/2022 on AML Law 28/2013/QH13 dated 12/06/2013 on CTF Other related regulations under Law (Decree, Circular about payment, transaction, open and usage of account, etc.)
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	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
6	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
)6 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.	
O. SANO	TIONS	
10. SAIN	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	Yes

	Does the Entity have policies, procedures or other	
100	controls reasonably designed to prohibit and/or detect	mag i a prinche stil ma manus i summania se i sun pestiti.
	actions taken to evade applicable sanctions prohibitions,	
	such as stripping, or the resubmission and/or masking.	Yes
	of sanctions relevant information in cross border	THE RESIDENCE OF THE PARTY OF T
	transactions?	To Committee and the Committee of the Co
101	Does the Entity screen its customers, including beneficia	
	ownership information collected by the Entity, during	The security of the security o
	onboarding and regularly thereafter against Sanctions	Yes much prome person of approximate
	Lists?	Typical manufacture and account to produce the production of the control of the c
102	What is the method used by the Entity for sanctions	Both Automated and Manual
102 a	screening?	Son Automated and Manual
102 a	if 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected,	Boot Brown and Control of the Contro
	what is the name of the vendor/tool?	The yearded a series MILLEINANCIAL TECHNICIS COVERS A TECHNICIS
	5527 E.C. Wich 3 1927 (September 1974)	The vendor's name: MIU FINANCIAL TECHNOLOGY PTY. LTD & TESS INNOVATION SDN BHD (TESS - MIU)
		Catogan vieru
102 a2	When did you last test the effectiveness (of finding	
	true matches) and completeness (lack of missing	The state of the s
	data) of the matching configuration of the	< 1 year Commonwelling in the second street with the second street w
	automated tool? (If 'Other' please explain in	The state of the s
103	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location information,	Yes
	contained in cross border transactions against Sanctions Lists?	builds duction with the althou year observed the second
104	What is the method used by the Entity?	Combination of puterwated and manual
105	Does the Entity have a data quality management	Combination of automated and manual
	programme to ensure that complete data for all	Yes
	transactions are subject to sanctions screening?	S. PAY MEET IT A VULLET BUTCH
106	Select the Sanctions Lists used by the Entity in its	
400	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	The second of th
100 D	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT	
esperier	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	the months carried an are wrong by Reff
		Refinitive (World Check) Datafile
	3	Netherlands sanction Lists Local and Internal Lists
		Escal and internal class
107	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:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g.	Tame any to a business days
	, Frijeren Pressinse, e.g.	
	branches, subsidiaries, or representative offices located	
	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU	No
	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive	No state of the party of the pa
	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 see the service and even with service and even the service and even t
109	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	State and commence and commence and and when
	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	No and the second secon
	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	asker evita adi puna es u persone di la delevite.
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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?  Yes	13. AUDIT 121  122  122 a 122 b 123  123 a 123 c 123 c 123 c 123 d 123 e 123 f	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?  How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  Internal Audit Department  External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology	Yearly Component based reviews  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Yes	13. AUDIT 121  122  122 a 122 b 123  123 a  123 c 123 d 123 e 123 f 123 g 123 h 123 i	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?  How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  Internal Audit Department  External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring	Yearly Component based reviews  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Yes	13. AUDIT 121  122  122 a 122 b 123  123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 f 123 g 123 h 123 i 123 i	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?  How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  Internal Audit Department  External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions	Yearly Component based reviews  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
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tracked to completion and assessed for adequacy and completeness?	13. AUDIT 121  122  122 a 122 b 123  123 a 123 c 123 c 123 c 123 c 123 f 123 g 123 h 123 i 123 j 123 k	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?  How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  Internal Audit Department  External Third Party  Does the internal audit function or other independent third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  Enterprise Wide Risk Assessment  Governance  KYC/CDD/EDD and underlying methodologies  Name Screening & List Management  Reporting/Metrics & Management Information  Suspicious Activity Filing  Technology  Transaction Monitoring  Transaction Screening including for sanctions  Training & Education	Yearly Component based reviews  Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
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125 a	If N, clarify which questions the difference/s relate to			-
	and the branch/es that this applies to.			
		103		
126	If appropriate, provide any additional information/context			
	to the answers in this section.	- AGI		
		the will place the place of the		
14. FRA	UD			Kanangan
127	Does the Entity have policies in place addressing fraud risk?	Yes		
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes		
129	Does the Entity have real time monitoring to detect fraud?	Yes	The potential from Trus	-
130	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	restrong like of the manufacturers and control of the control of t	erri
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes	Ad restore with Sent extrement our time	
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.			
	DE 10 PM/ arti mul irilimo PO mile violantes e el base de	man, And James and J. Harris J.V. add 1100		
132	If appropriate, provide any additional information/context to the answers in this section.	Vincinal Anni guirens 1831		
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## Declaration Statement

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)

Southeast Asia Commercial Joint Stock Bank (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 Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, LE QUOC LONG (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my hor est belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. LE QUOC LONG

2710512024

(Signature & Date)

KHOAN (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct am author ed to execute this declaration on behalf of the Financial Institution.

NKIEM-TY

27/05/2024

(Signature & Date)