## the Wolfsberg Group

Financial	Institution	Name:

UNION BANK OF INDIA

Location (Country):

	 		 <u> </u>
INDIA			

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 CBDDO 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.

Full Legal Name	armonistraka Armonistraka
Append a list of foreign branches which are covered by this questionnaire  All branches located in India and our overseas branches at Hong Kong, Sydney, Du Delta (Registered) Address  Union Bank Bhavan, 239, Backbay Reclamation, Vidhan Bhavan Marg, Nariman Podu 0021  Full Primary Business Address (if different from above)  NA  Date of Entity incorporation/ establishment  11.11.1919  Select type of ownership and append an ownership chart if available  a Publicly Traded (25% of shares publicly traded)  Yes  1. Bombay Stock Exchange - Script Code - 532477  2. National Stock Exchange - Script Code - UNIONBANK-EQ  No  Member Owned/ Mutual  No  Government or State Owned by 25% or more  Yes  No  No  Yes  No  No  Yes  No  No  No  No  No  No  No  No  No  N	
Full Legal (Registered) Address  Union Bank Bhavan, 239, Backbay Reclamation, Vidhan Bhavan Marg, Nariman Pc 400 021  Full Primary Business Address (if different from above)  Date of Entity incorporation/ establishment  Select type of ownership and append an ownership chart if available  Publicly Traded (25% of shares publicly traded)  If Y, Indicate the exchange traded on and ticker symbol  Member Owned/ Mutual  Member Owned/ Mutual  C Government or State Owned by 25% or more  D Privately Owned  If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more  What is a summer of the relevant branchies which operate under an Offshore Banking License (OBL)?  If Y, provide the name of the relevant branchies which operate under an OBL  Name of primary financial regulator / supervisory  Name of primary financial regulator / supervisory  PESEDI/E RANK OF INDIA  Description and our overseas branches and our overseas branches and our overseas branches at Hong Kong, Sydney, During Address and our overseas branches at Hong Kong, Sydney, During Advocate and our overseas branches and our overseas theory and our overseas and our overseas and our overseas and our overseas though and our overseas and our our overseas and our overseas and our overseas and our overseas an	
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10	Provide Legal E	ntity Identifier (LEI) if available	5493000P4HD6132SQ711
			9-33500 Ti 150 T0 20 47 17
11	Provide the full	legal name of the ultimate parent the Entity completing the DDQ)	NA
	(ii dilioioni ii on		
12	Jurisdiction of li	censing authority and regulator	NA NA
<u>-</u>		nt	NA .
13	Select the busin	ness areas applicable to the	
13 a	Retail Banking		Yes
13 b	Privale Banking	/ Wealth Management	No
13 c	Commercial Ba	nking	Yes
13 d	Transactional E	lanking	Yes
13 e	. Investment Bar		
	-	•	Yes
13-f	Financial-Marke		Yes
13 g	Securities Serv	ices / Custody	Yes
13 h	Broker / Dealer		No
13 i	Multilateral Dev	relopment Bank	Nο
13 J	Other		NA
14	Does the Entity	have a significant (10% or more)	
	nortfolio of non	-resident customers or does it an 10% of its revenue from non-	
	resident custor	ners? (Non-resident means parity resident in a different	No _
'	jurisdiction to the	ne location where bank services	
14 a	are provided:)	e top five countries where the non-	NA .
	resident custor	ners are located.	
15	Select the clos	est value:	
. 15 a	Number of em	ployees	10001+
15 b	Total Assets		Greater than \$500 million
16	Confirm that al	I responses provided in the above	Yes
L.	representative	Y & OWNERSHIP are of all the LE's branches	Tes
16 a	if N, clarify whi	ich questions the difference/s ne branch/es that this applies to.	NA '
16 E	If appropriate,	provide any additional information	NA .
	/ context to the	answers in this section.	
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It place to Identify downstream relationships with domestic banks?  17 as Does the Entity offer correspondent banking services to Preging Banks?  17 at Does the Entity allow downstream relationships with Foreign Banks?  17 at Does the Entity banks?  17 at Does the Entity banks?  17 at Does the Entity dia correspondent banking procedures in place to identify downstream relationships with Foreign Banks?  17 at Does the Entity dia correspondent banking services to regulated MSB/MVTS?  17 at Does the Entity dia correspondent banking services to regulated MSB/MVTS?  18 at Does the Entity dia correspondent banking services to regulated MSB/MVTS?  19 at Does the Entity dia correspondent banking services to regulated MSB/MVTS?  19 at Does the Entity dia correspondent banking services to regulated MSB/MVTS?  19 at Does the Entity dia correspondent banking services to regulated MSB/MVTS?  19 banks/MVTS?  10 better the Entity dia correspondent banking services to regulated MSB/MVTS?  10 banks/MVTS?  10 banks/MVTS?  10 banks/MVTS?  11 banks/MVTS?  11 banks/MVTS?  12 banks/MVTS?  13 banks/MVTS?  14 banks/MVTS?  15 banks/MVTS?  16 banks/MVTS?  17 carrespondent particles and procedures with MSB/MVTS?  18 banks/MVTS?  18 banks/MVTS?  19 banks	17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
services to Foreign Banks?  78 aB Ose the Entity allow downstream relationships with Foreign Banks?  77 aT Ose the Entity show processes and procedures in place to identify downstream relationships with Foreign Banks?  78 aB Oses the Entity after processes and procedures in place to identify downstream relationships with Foreign Banks?  79 aD Oses the Entity after processes and procedures banking services for regulated MSRAM/TS?  79 aD Oses the Entity after processes and procedures in place to identify downstream relationships with MSBAM/TS?  79 aD oses the Entity after processes and procedures in place to identify downstream relationships with MSBAM/TS?  70 better Entity after processes and procedures in place to identify downstream relationships with MSBAM/TS?  71 b Private Banking (downstream relationships with MSBAM/TS?  71 b Private Banking (downstream relationships with MSBAM/TS?  72 b Private Banking (downstream relationships with MSBAM/TS?  73 b Private Banking (downstream relationships with MSBAM/TS?  74 c Trade Finiance  74 c Trade Finiance  75 c Trade Finiance  76 c Tross Border Bulk Cash Delivery  77 p Domestic Bulk Cash Delivery  78 p Domestic Bulk Cash Delivery  79 p Domestic Bulk Cash Delivery  70 p Domestic Bulk Cash Delivery  71 h International Cash Letter  71 ves  72 p Over Border Remittances  73 p Over Border Remittances  74 p Septice to walk-in customers (non-account holders)  75 p Over Border Remittances  76 p Septice to walk-in customers (non-account holders)  77 p Over Border Remittances  78 p Septice to walk-in customers (non-account holders)  79 p Over Border Remittances  79 p Septice to walk-in customers (non-account holders)  79 p Over Border Remittances  79 p Septice to walk-in customers (non-account holders)  79 p Over Border Remittances  79 p Septice to walk-in customers (non-account holders)  79 p Over Border Remittances  79 p Septice to walk-in customers (non-account holders)  79	17 a4	in place to identify downstream relationships	
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17 a7 Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banki? 17 a8 Does the Entity effect correspondent banking services for regulated MSBanAVTS? 18 a Does the Entity effect correspondent banking services for regulated MSBanAVTS? 19 Does the Entity allow downstream relationships with MSBanAVTS? 19 Does the Entity allow downstream relationships with MSBanAVTS? 19 Does the Entity allow downstream relationships with MSBanAVTS? 19 Does the Entity allow downstream relationships with MSBanAVTS? 19 Does the Entity allow downstream relationships with MSBanAVTS? 19 Does the Entity allow downstream relationships with MSBanAVTS? 19 Does to Identity downstream relationships with MSBanAVTS? 19 Does to Identity downstream relationships with MSBanAVTS? 19 Does to Identity downstream relationships with MSBanAVTS? 19 Does Border Bulk Cash Delivery 19 No 19 Does Border Bulk Cash Delivery 19 No 19 Does Border Bulk Cash Delivery 19 Ves International Cash Letter 19 Virtual // Digital Currencies 19 No 19 Virtual // Digital Currencies 19 No 19 Does Border Remittances 19 No 19 Does Border Remittances 19 No 19 Other high fisk products and services identified by the Entity 19 Does Securities And Services Identified by the Entity 19 Does Securities And Services Identified by the Entity with Cash Questions the difference/or relate to and the branchives that this applies to. 19 Difference of the Anderson of the LE's branches relationships for relate to and the branchives that this applies to.	17 a6		No
services to regulated MSB-MAVTS? 17 a 99  set be Entity allow overwriteram relationships with MSB-MAVTS? 17 a 10  To the Entity the processes and procedures in place to identify downstream relationships with MSB-MAVTS? 17 b Private Barithing (cornestic & International) 17 c Trade Firiance 17 d Payable Through Accounts 17 e Stored Value Instruments 17 e Stored Value Instruments 17 f Cross Border Bulk Cash Delivery 17 g Domestic Bulk Cash Delivery 17 h International Cash Letter 17 h International Cash Letter 17 h International Cash Letter 17 k Low Price Securities 18 h Individual No 19 Service to walk-in customers (non-account holders) 19 Service to walk-in customers (non-account holders) 19 Other high risk products and services Identified by the Entity 18 h International Cash Exercises are representable of all the LE's branches 18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  18 b If appropriate, provide any additional Information	17 a7	Does the Entity have processes and procedures in place to identify downstream relationships	
17 a9 Does the Entity allow downstream relationships with MSSeAPVTS7 17 a10 Does the Entity have processes and procedures in place to identify downstream relationships with MSS AAVTS7 17 b Private Benking (comestic & International) 17 c Trade Finance Yes 17 d Payable Through Accounts No 17 e Stored Value Instruments Yes 17 f Cross Border Bulk Cash Delivery No 17 g Domestic Bulk Cash Delivery Yes 17 h International Cash Letter Yes 17 h International Cash Letter Yes 17 l Remote Deposit Capture No 17 j Virtual /Digital Currencies No 17 k Low Price Securities No 17 l Hold Mall No 17 m Cross Border Remittances Yes 17 n Cross Border Remittances Yes 17 n Service to walk-in-customers (non-account holders) 17 o Sponsoring Private ATMs No 17 p Other high risk products and services identified by the Entity 18 a No. Lardry which questions the difference/s relate to and the branch/es that this applies to. 18 a IN, clarify which questions the difference/s relate to and the branch/es that this applies to.	17 a8		No
17 10 Does the Entity have processes and procedures in place to identity downstream relationships with MSB //MVTS?  17 b Private Banking (domestic & International)  17 c Trade Finance  Yes  17 d Payable Through Accounts  No  17 e Stored Value instruments  Yes  17 f Cross Border Bulk Cash Delivery  No  17 g Domestic Bulk Cash Delivery  Yes  17 h International Cash Letter  Yes  17 l Remote Deposit Capture  No  17 j Virtual //Digital Currencies  No  17 k Low Price Securities  No  17 l Hold Mall  No  17 m Cross Border Remittances  Yes  17 n Service to walk-in customers (non-account holders)  Yes  17 o Sponsoring Private ATMs  No  17 p Other high risk products and services Identified by the Entity  18 a If N, Clarify which questions the difference/s relate to and the branch/es that this applies to.  If a b If appropriate, provide any additional information  MA	17 a9	Does the Entity allow downstream relationships	
17 b Private Banking (domestic & international) 17 c Trade Finiance 17 d Payable Through Accounts No 17 e Stored Value instruments 17 e Cross Border Bulk Cash Delivery No 17 g Domestic Bulk Cash Delivery Yes 17 h International Cash Letter Yes 17 l Remote Deposit Capture No 17 j Virtual /Digital Currencies No 17 k Low Price Securities No 17 rm Cross Border Remittances Yes 17 n Service to walk-in customers (non-account holders) 17 o Sponsoring Private ATMs No 17 p Other high risk products and services identified by the Entity  18 a Confirm that all responses provided in the above section PRODUCTS & SERVICES are representative of all the LEs branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If S b If Appropriate, provide any additional information No	17 a10	Does the Entity have processes and procedures in place to identify downstream relationships	
Yes   Yes   Yes   No   17 e   Stored Value instruments   Yes   Y	17 b	Private Banking (domestic & international)	No
Stored Value Instruments   Yes	17 c	Trade Finance	Yes
Yes  17 f Cross Border Bulk Cash Delivery No  17 g Domestic Bulk Cash Delivery Yes  17 h International Cash Letter Yes  17 l Remote Deposit Capture No  17 J Virtual //Digital Currencies No  17 k Low Price Securities No  17 l Hold Mail No  17 m Cross Border Remittances Yes  17 n Service to walk-in customers (non-account holders)  17 o Sponsoring Private ATMs No  17 p Other high risk products and services Identified by the Entity  18 c Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  18 b If appropriate, provide any additional information NA	17 d	Payable Through Accounts	No
No 17 g Domestic Bulk Cash Delivery Yes 17 h International Cash Letter Yes 17 l Remote Deposit Capture No 17 J Virtual /Digital Currencies No 17 k Low Price Securities No 17 l Hold Mall No 17 m Cross Border Remittances Yes 17 n Service to walk-in customers (non-account holders) 17 o Sponsoring Private ATMs No 17 p Other high risk products and services identified by the Entity NA 18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches Yes 18 a If N clarify while duestions the difference/s relate to and the branch/es that this applies to.	17 e	Stored Value instruments	Yes
17 h International Cash Letter  Yes  17 I Remote Deposit Capture  No  17 J Virtual /Digital Currencies  No  17 L Low Price Securities  No  17 I Hold Mali  No  17 m Cross Border Remittances  Yes  17 n Service to walk-in customers (non-account holders)  17 o Sponsoring Private ATMs  No  17 p Other high risk products and services identified by the Entity  No  18 Confirm that all responses provided in the above section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	17 f	Cross Border Bulk Cash Delivery	No
Yes   Yes   No   No	17 g	Domestic Bulk Cash Delivery	Yes
No  17 I Virtual /Digital Currencies  No  17 I Low Price Securities  No  17 I Hold Mail  No  17 m Cross Border Remittances  Yes  17 n Service to walk-in customers (non-account holders)  17 o Sponsoring Private ATMs  No  17 p Other high risk products and services Identified by the Entity  NA  18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  NA	17 h	International Cash Letter	Yes
17 k Low Price Securities  No  17 I Hold Mall  No  17 m Cross Border Remittances  Yes  17 n Service to walk-in customers (non-account holders)  Yes  17 o Sponsoring Private ATMs  No  17 p Other high risk products and services Identified by the Entity  NA  18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  NA	17 1	Remote Deposit Capture	No
17 I Hold Mall No  17 m Cross Border Remittances Yes  17 n Service to walk-in customers (non-account holders)  17 o Sponsoring Private ATMs No  17 p Other high risk products and services identified by the Entity  18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  NA  18 b If appropriate, provide any additional information NA	17 J	Virtual /Digital Currencies	No
17 m Cross Border Remittances  Yes  17 n Service to walk-in customers (non-account holders)  17 o Sponsoring Private ATMs  No  17 p Other high risk products and services identified by the Entity  NA  18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  NA  18 b If appropriate, provide any additional information NA	17 k	Low Price Securities	No
17 m Cross Border Remittances  Yes  17 n Service to walk-in customers (non-account holders)  17 o Sponsoring Private ATMs  No  17 p Other high risk products and services identified by the Entity  NA  18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  18 b If appropriate, provide any additional information MA	17	Hold Mail	No
holders)  Sponsoring Private ATMs  No  To Sponsoring Private ATMs  No  To Other high risk products and services identified by the Entity  NA  Confirm that all responses provided in the above Section PRODUCTS & SERVICES 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 MA	17 m	Cross Border Remittances	Yes
17 o Sponsoring Private ATMs No  17 p Other high risk products and services identified by the Entity NA  18 Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  18 b If appropriate, provide any additional information NA	17 n		Yes
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Section PRODUCTS & SERVICES are representative of all the LE's branches  18 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  NA  18 b If appropriate, provide any additional information MA			
relate to and the branch/es that this applies to.  18 b If appropriate, provide any additional information No.		Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
	18 a		NA
i i	18 b		NA .

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3 AML	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	Yes
19 b	Cash Reporting	Yes
19 c	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 1	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	-Yes
19 1	Adverse Information Screening	Yes
1,9 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	51+
21	is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Annually
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23 a	If Y, provide further details	NA
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA
24 b	If appropriate, provide any additional information / context to the answers in this section.	NA
<u></u>		

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10,4,0 PM, 1 PMA : 1-4	IBRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermedianes	Yes
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entitles or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes



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37	Does the Entity provide mandatory ABC training to:		
37 a	Board and senior Committee Management .	Yes	
37 b	1st Line of Defence	Yes	ļ
37 c	2nd Line of Defence	Yes	
37 d	3rd Line of Defence	Yes	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	
37 f	Non-employed workers as appropriate (contractors/consultants)	No	ļ ·
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA	
39 b	If appropriate, provide any additional information / context to the answers in this section.	NA .	
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·	CTF & SANCTIONS POLICIES & PROCE	
<b>\$0</b>	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
• •	reasonably prevent, detect and report:	
0 a	Money laundering	
	isotiey laundering	Yes
0 b	Terrorist financing	Yes
0 c	Sanctions violations	Yes
-1	Are the Entity's policies and procedures updated	
2	at least annually?	Yes
2	Are the Entity's policies and procedures gapped against/compared to:	
2 a	US Standards	Yes
2 a1	If Y, does the Entity retain a record of the results?	Yes
12 b	EU Standards	Yes
\$2 b1	If Y, does the Entity retain a record of the	Yes ·
13	results?  Does the Entity have policies and procedures	
13 a	that:  Prohibit the opening and keeping of anonymous	
·	and fictitious named accounts	Yes
‡3 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
13 c	Prohibit dealing with other entitles that provide banking services to unlicensed banks	Yes
3 d	Prohibit accounts/relationships with shell banks	Yes
13 e	Prohibit dealing with another entity that provides services to shell banks	Yes
3 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
13 g	Prohibit opening and keeping of accounts for	
	any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	Yes
•	bureaux de change or money transfer agents	
13 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and	Yes
13 1	ciose associates  Define escalation processes for financial crime	
	risk issues	Yes
13 J	Define the process, where appropriate, for terminating existing customer relationships due	Yes
13 k	to financial crime risk Specify how potentially suspicious activity	
	identified by employees is to be escalated and investigated	Yes
13 I	Outline the processes regarding screening for	Yes
13 m	sanctions, PEPs and negative media Outline the processes for the maintenance of	
14	internal "watchlists"  Has the Entity defined a risk tolerance statement	Yes
	or similar document which defines a risk boundary around their business?	Yes
15	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
15 a	If Y, what is the retention period?	5 years or more
6	Confirm that all responses provided in the above	•
	Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
6.a	If N, clarify which questions the difference/s	NIA
	relate to and the branch/es that this applies to.	NA '
<u>,</u>		
16 b	if appropriate, provide any additional information / context to the answers in this section.	NA
		· · · · · · · · · · · · · · · · · · ·

6. AML	CTF & SANCTIONS RISK ASSESSMENT		400
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	•	
47 a	Client	Yes	
47 b	Product	Yes	
47 c	Channel	Yes	
47_d	Geography	Yes	}
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
48 a	Transaction Monitoring	Yes	]
48 b	Customer Due Diligence	Yes	
48 c	PEP Identification	Yes	
48 d	Transaction Screening	Yes	
48 e	Name Screening against Adverse Media & Negative News	Yes	
48 f	Training and Education	Yes	1
48 g	Governance	Yes .	
48 h	Management Information	Yes	
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	NA	
50	Does the Entity's Sanctions EWRA cover the Inherent risk components detailed below:		]
50 a	Client	Yes	
50 b	Product	Yes	
50 c	Channel	Yes	1
50 d	Geography	Yes	



Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
Customer Due Diligence	Yes ·
Transaction Screening	Yes
Name Screening	Yes
List Management	Yes
Training and Education	Yes
Governance	Yes
Management Information	Yes
Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
if N, provide the date when the last Sanctions EWRA was completed.	NA
Confirm that all responses provided in the above Section AML_CTF & SANCTIONS RISK	
ASSESSMENT 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.	NA
If appropriate, provide any additional information / context to the answers in this section.	NA
	controls effectiveness components detailed below:  Customer Due Diligence  Transaction Screening  Name Screening  List Management  Training and Education  Governance  Management information  Has the Entity's Sanctions EWRA been completed in the last 12 months?  If N, provide the date when the last Sanctions EWRA was completed.  Confirm that all responses provided in the above Section.AML, CTF & SANCTIONS RISK.  ASSESSMENT 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.





7. KYC.	CDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes .	
55	of onboarding or within 30 days	Yes	
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
56.a	Ownership structure	Yes	
56 b	Customer identification	Yes	
56 c	Expected activity	Yes	
56 d	Nature of business/employment	Yes	
56 e	Product usage	Yes	
56 f	Purpose and nature of relationship	Yes	
56 g	Source of funds	Yes	
56 h	Source of wealth	Yes	
57	Are each of the following identified:		
57 a	Ultimate beneficial ownership	Yes	
57 a1	Are ultimate beneficial owners verified?	Yes	
57 b	Authorised signatories (where applicable)	Yes	•
57 c	Key controllers	Yes	
57 d	Other relevant parties	NA	
		·	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	15%	
59	Does the due diligence process result in customers receiving a risk classification?	Yes	



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60	if Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
<u> </u>		
60 a	Product Usage	Yes .
60 p	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	NA
	:	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes



70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
70 a	Non-account customers	EDD & restricted on a risk based approach
70 b	Non-resident customers	EDD & restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	⁻EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 n	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD on a risk based approach
70 j	Atomic power	Do not have this category of customer or industry
70 k	Extractive industries	Do not have this category of customer or industry
70 1	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	EDD on a risk based approach
70 n	Regulated charities	EDD & restricted on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	EDD & restricted on a risk based approach
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	EDD & restricted on a risk based approach
70 V	Other (specify)	NA
71	If restricted, provide details of the restriction	NA
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	NA
73 b	If appropriate, provide any additional information / context to the answers in this section.	NA .

as H

74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	Behavioral pattern transactions are being monitored manually.
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	NA
	32.	
79 b	If appropriate, provide any additional information / context to the answers in this section.	NA



9. PAY	MENTTRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
B1	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	Based on PMLA Act 2002, UAPA Act 1967
81 c	If N, explain	NA
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	if N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA
85 b	If appropriate, provide any additional information / context to the answers in this section.	NA NA

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10. SAN	ICTIONS	
86	Does the Entity have a Sanctions Policy	
1.	approved by management regarding	
	compliance with sanctions law applicable to the	Yes
	Entity, Including with respect its business	163
1	conducted with, or through accounts held at	
	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
1	other controls reasonably designed to prevent the use of another entity's accounts or services	
	in a manner causing the other entity to violate	Yes .
	sanctions prohibitions applicable to the other	Tes .
	entity (including prohibitions within the other	and the second of the second
	entity's local jurisdiction)?	
88	Does the Entity have policies, procedures or	
1.	other controls reasonably designed to prohibit	:
	and/or detect actions taken to evade applicable	
1	sanctions prohibitions, such as stripping, or the	Yes
1	resubmission and/or masking, of sanctions	
	relevant information in cross border	
<u> </u>	transactions?	
89	Does the Entity screen its customers, including beneficial ownership information collected by the	
	Entity, during onboarding and regularly	Yes
İ	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
	le	Automated
91	Does the Entity screen all sanctions relevant	
1.	data, including at a minimum, entity and location	, •
	information, contained in cross border	Yes
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
		Automated
93	Select the Sanctions Lists used by the Entity in	
1	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners and for fillering transactional data
93 b	United States Department of the Treasury's	Head for a section of the first transfer of
L	Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for fillering transactional data
93 c	Office of Financial Sanctions Implementation	lood for encoping quaterness and handfaid assessment for State and the
	HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
		osed for screening customers and beneficial owners and for intering transactional data
93 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
		osed for screening customers and beneficial owners and for intening transactional data
93 f	Other (specify)	NA .
94	Question removed	
95	When regulatory authorities make updates to	
	their Sanctions list, how many business days	
]	before the entity updates their active manual and/	
1	or automated screening systems against:	
95 a	Customer Data	
		Same day to 2 business days
		carro out to a susmisse days
95 b	Transactions	
		Come devite O bush and down
		Same day to 2 business days
	· 1 A	

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96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No			
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes	·		 
97 a	If N, clarify which questions the difference/s relate-to-and-the-branch/es.that.this.applies.to	NA		 	
97 b	If appropriate, provide any additional information / context to the answers in this section.	NA	 		



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11 TRA	INING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 đ	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes .
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to:	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable .
99 f	Non-employed workers (contractors/consultants)	Not Applicable
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101 <sup>.</sup>	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	if N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA .
102 b	if appropriate, provide any additional information / context to the answers in this section.	NA



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Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes	
Compliance Testing process (separate to the independent Audit function)?	Yes	· · · · · · · · · · · · · · · · · · ·
Section QUALITY ASSURANCE / COMPLIANCE TESTING 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.	NA	•
If appropriate, provide any additional information / context to the answers in this section.	NA	
	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?  Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING 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.	Subject to quality assurance testing?  Does the Entity have a program wide risk based Compliance Testing process (separate to the Independent Audit function)?  Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches  If N, clarity which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information  If appropriate, provide any additional information



13. AUI	OIT.	
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j -	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 I	Other (specify)	NA
109	Are adverse findings from Internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA
110 b	If appropriate, provide any additional information / context to the answers in this section.	NA

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## **Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

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)

[UNION BANK OF INDIA] (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 obligations.

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 on an annual basis.

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

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

(MERO or equivalent), certify that I have read and understood this declaration, that the answers provided in this-honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. DR: K. L. RAJU Wolfsberg CBDDQ

S. V. BIJÚ

(Signature & Date)

DR! K. L. RAJU