the Wolfsberg Group

Financial Institution Name:	Bank of Beirut (UK) Ltd
Location (Country) :	United Kingdom

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

No #	Question	Answer
	TY & OWNERSHIP	, and the same of
1	Full Legal Name	
	. s. Euga rano	Bank of Beirut (UK) Limited
2	Append a list of foreign branches which are covered by this questionnaire	London (Head Office)
3	Full Legal (Registered) Address	66 Cannon Street, London. UK. EC4N 6AE
4	Full Primary Business Address (if different from above)	As above
5	Date of Entity incorporation/ establishment	30th March 2002
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Bank of Beirut SAL, Beirut, Lebanon - 100%
7	% of the Entity's total shares composed of bearer shares	Nii
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Prudential Regulation Authority (PRA) -UK & Financial Conduct Authority (FCA) -UK
10	Provide Legal Entity Identifier (LEI) if available	213800AQHMYPEH8NNA33
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Bank of Beirut SAL, Beirut, Lebanon - 100%

12	Jurisdiction of licensing authority and regulator of ultimate parent	Lebanon, Banque du Liban
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	No
13 f	Financial Markets Trading	No
13 g	Securities Services / Custody	No No
13 h	Broker / Dealer	
13 i	Multilateral Development Bank	No L.
13 j	Other	No
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	Yes
14 a	If Y, provide the top five countries where the non-resident customers are located.	Lebanon, 56.4% by value
15	Select the closest value:	
15 a	Number of employees	51-200
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	
2. PRO	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
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17 a10	Does the Entity have processes and procedures	V
	in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	Yes
17 m	Cross Border Remittances	No
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	
	-,	No
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	#17 I - Hold Mail not permitted on any new accounts
3 AMI	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards	
19 a	Appointed Officer with sufficient	Yes
19 b	experience/expertise 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 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
1		1100
19 n	Training and Education	Voc
19 n 19 o	Training and Education Transaction Monitoring	Yes Yes

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11 is the Entity a AML CFT & Samctions policy approved a least annually by the Board or approved a least annually by the Board or approved a least annually by the Board or approved a least annual by the Board or approved annual annua	20	AML, CTF & Sanctions Compliance	Less than 10
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Does the Entity perform an Enterprise Wide ABC risk assessment? If Y select the frequency Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Pes Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Pes Yes	32	Does the Entity's Board or Senior Management Committee receive regular Management	Yes
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Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	33 a		
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risk components detailed below: 35 a Potential liability created by intermediaries and other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes		that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
other third-party providers as appropriate 35 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes Yes	35		
and industries in which the Entity does business, directly or through intermediaries Yes	35 a	other third-party providers as appropriate	Yes
	35 b	and industries in which the Entity does	Yes
35 c I ransactions, products or services, including	35 c	Transactions, products or services, including	
those that involve state-owned or state- controlled entities or public officials Yes		those that involve state-owned or state-	Yes

35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 е	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
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 с	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)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	
5. AML.	CTF & SANCTIONS POLICIES & PROCE	DURES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	No
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

43 i	Define escalation processes for financial crime	Yes
43 j	risk issues Define the process, where appropriate, for	100
	terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	
	CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 с	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
I	l	I

51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	
	CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 с	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	
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 с	Key controllers	Yes
57 d	Other relevant parties	Yes
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes

60 d Legal Entity type (20 c) Adverse information (31 c) Orbar (specify) Asilty and willingness to provide financial and source of wealth data and associated PEP status. (41 c) Does the Entity have a risk based approach to screening outstoness for adverse indistinguisher lever? (42 c) Orbar (specify) (43 c) Orbar (specify) (44 c) Orbar (specify) (45 c) Orbar (specify) (45 c) Orbar (specify) (46 c) Orbar (specify) (46 c) Orbar (specify) (47 c) Orbar (specify) (48 c) Orbar (specify) (48 c) Orbar (specify) (49 c) Orbar (specify) (49 c) Orbar (specify) (49 c) Orbar (specify) (49 c) Orbar (specify) (40 c) Orb	60 c	Business Type/Industry	Yes
66 I Olmer (generally) 66 I Olmer (generally) Ability and willingness to peroods financial and source of weath data and associated PEP status. 67 I Can be the Entity have a risk based approach to scenaring customers for adverted in a common of	60 d	Legal Entity type	
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Ability and willingness to provide therecal and source of seath date and associated PEP status 51 Does the Entity have a risk based approach to sorrowing outbrowns for adverse to adverse control of the status of	60 f	Other (specify)	Yes
screening outcomes for adverse modulinegative news? 42 a Vr. is this act 43 a Orboarding 44 Description of the Entity the Entity to screen controlled by PEED outcomes of the Entity the Entity to screen controlled by PEED outcomes of the Entity the Entity to screen controlled by PEED outcomes and processes for rower and equation between the parties to determine whether they are peed outcomes and controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine whether they are peed outcomes and updated controlled parties to determine and they are peed to the peed outcomes and updated controlled parties to determine and they are peed to the peed to th			Ability and willingness to provide financial and source of wealth data and associated PEP status
62 a Obcarding 62 b KYC renewal 63 C Trigger event 63 What is the method used by the Entity to screen for a review medial / regulative news? 64 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled distermine whether they are PEPs, or controlled parties to distermine whether they are PEPs, or controlled parties to distermine whether they are PEPs, or controlled parties to distermine whether they are PEPs, or controlled parties to distermine whether they are PEPs, or controlled parties to the person of the	61	screening customers for adverse media/negative news?	Yes
Ves	62	If Y, is this at:	
Ves	62 a	Onboarding	Yes
What is the method used by the Entity to screen for adverse medial / negative news? 4 Does the Entity have a risk based approach to determine whether they are PEPs, or controlled to PEPs and the method used by the Entity to screen PEPs, or controlled to PEPs and the method used by the Entity to screen PEPs, or controlled to PEPs and the method used by the Entity to screen PEPs, or controlled to PEPs and the method used by the Entity to screen PEPs, or controlled to PEPs and the method used to the entity they are procedure and another they are personal to determine whether they are personal to determine whether they are personal to determine whether they are PEPs, or controlled to PEPs and they are process to review and update used from screening postioners and connected parties to determine whether they are PEPs, or controlled to PEPs and they are process to review and update used from screening postioners and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are process to review and update used from screening postioners and they are processed to the process and they are processed from the processed from the processed	62 b	KYC renewal	Yes
to a diverse media / negative news? 4 Does the Entity have a risk based approach to screening outsomers and connected parties to determine whether they are PEPs, or controlled by PEPs? 55 If Y, is this at: 65 a Onboarding Yes 65 b KYC renewal 66 Vigger event Yes 66 Vhat is the method used by the Entity to screen PEPs? 67 Does the Entity have policies, procedures and processas to review and ecasiate potential connected parties to desermine whether they are PEPs, controlled by PEPs? 68 Does the Entity have a process to review and update usofane in Connected parties to desermine whether they are PEPs, controlled by PEPs? 68 Does the Entity have a process to review and update usofane information based on: 69 A KYC renewal 70 Trigger event 70 From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity restricted, or prohibited by the Entity restricted, or prohibited by the Entity set CPL programme? 70 A Non-account customers 70 A Non-account customers PEPs EDD & restricted on a risk based approach 70 C Shell banks Prohibited 70 PEPs EDD & restricted on a risk based approach Yes EDD & restricted on a risk based approach Yes Do A restricted on a risk based approach Yes EDD & restricted on a risk based approach Yes Do A restricted on a risk based approach Yes EDD A restricted on a risk based approach Yes EDD A restricted on a risk based approach Yes Do A restricted on a risk based approach PED A restricted on a risk based approach Yes EDD A restricted on a risk based approach PEPs Do A restricted on a risk based approach Yes EDD A restricted on a risk based approach Yes Do A restricted on a risk based approach Yes Extractive industries EDD A restricted on a risk based approach Yes Extractive industries EDD A restricted on a risk based approach Yes Extractive industries EDD A restricted on a risk based approach Yes Do A restricted on a risk based approach Yes EDD A restricted on a risk bas	62 c	Trigger event	Yes
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Sa		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
Yes 55 b	65	If Y, is this at:	
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PEPs? Combination of automated and manual	65 c	Trigger event	Yes
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Prohibited 70 e PEPs	70 c	Shell banks	Prohibited
EDD & restricted on a risk based approach PEP Related EDD & restricted on a risk based approach If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014? To i Arms, defense, military Prohibited To k Extractive industries EDD & restricted on a risk based approach Precious metals and stones EDD & restricted on a risk based approach	70 d	MVTS/ MSB customers	Prohibited
FDD & restricted on a risk based approach TO B PEP Close Associate EDD & restricted on a risk based approach FDD & restricted on a risk based approach EDD & restricted on a risk based approach Yes Yes To in the Wolfsberg Correspondent Banking Principles 2014? For in the Wolfsberg Correspondent Banking Principles 2014?	70 e	PEPs	EDD & restricted on a risk based approach
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70 h1 If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014? 70 i Arms, defense, military Prohibited 70 j Atomic power Prohibited 70 k Extractive industries EDD & restricted on a risk based approach	70 g	PEP Close Associate	EDD & restricted on a risk based approach
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70 j Atomic power Prohibited 70 k Extractive industries EDD & restricted on a risk based approach		assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 k Extractive industries EDD & restricted on a risk based approach 70 l Precious metals and stones	70 i	Arms, defense, military	Prohibited
TO I Precious metals and stones	70 j	Atomic power	Prohibited
70 I Precious metals and stones Prohibited	70 k	Extractive industries	EDD & restricted on a risk based approach
	70 I	Precious metals and stones	Prohibited

70 m	Unregulated charities	Prohibited
70 n	Regulated charities	Prohibited
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	Prohibited
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD & restricted on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	Prohibited
70 v	Other (specify)	Frombiled
71	If restricted, provide details of the restriction	Extractive Industries relevant since the Bank works with commodity based economies; no current clients. Embassies less than 4 accounts linked to geography and for office working expenses only
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	
73 b	If appropriate, provide any additional information / context to the answers in this section.	
8. MON	ITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	ad hoc in response to issues raised on specific transactions
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
9. PAYN	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
L	<u> </u>	

81 c If N, 82 Does responded inclusion inclus		Yes Yes
82 Does respond the state of th	is the Entity have processes in place to bond to Request For Information (RFIs) from er entities in a timely manner? Is the Entity have controls to support the usion of required and accurate originator rmation in international payment messages? Is the Entity have controls to support the usion of required beneficiary information rnational payment messages? If if the above tion PAYMENT TRANSPARENCY are esentative of all the LE's branches clarify which questions the difference/s te to and the branch/es that this applies to. Interpretation of the provide any additional information intext to the answers in this section.	Yes Yes
respondented and service and s	cond to Request For Information (RFIs) from a tentities in a timely manner? Is the Entity have controls to support the usion of required and accurate originator rmation in international payment messages? Is the Entity have controls to support the usion of required beneficiary information rnational payment messages? If it is a likely a support the usion of required beneficiary information rnational payment messages? If it is a likely a support the usion PAYMENT TRANSPARENCY are esentative of all the LE's branches clarify which questions the difference/s te to and the branch/es that this applies to expropriate, provide any additional information intext to the answers in this section.	Yes Yes
83 Does inclusinform 84 Does inclusinform 85 Confrequence 85 a If N, relate 85 b If approximate a proximate a prox	is the Entity have controls to support the usion of required and accurate originator rmation in international payment messages? Is the Entity have controls to support the usion of required beneficiary information rnational payment messages? If irm that all responses provided in the above tion PAYMENT TRANSPARENCY are esentative of all the LE's branches clarify which questions the difference/s te to and the branch/es that this applies to expropriate, provide any additional information intext to the answers in this section.	Yes
84 Does inclusinters 85 Confi Secti repre 85 a If N, relate 85 b If app / con 10. SANCTIC 86 Does approvith inclusions inclusions of the the use in a result of the continuation of the sance entity	is the Entity have controls to support the usion of required beneficiary information rnational payment messages? firm that all responses provided in the above tion PAYMENT TRANSPARENCY are essentative of all the LE's branches clarify which questions the difference/s te to and the branch/es that this applies to.	
85 a If N, relate 85 b If app / con 10. SANCTIC 86 Does approvith included with, finan 87 Does other the u in a r sanc entity	tion PAYMENT TRANSPARENCY are esentative of all the LE's branches clarify which questions the difference/s te to and the branch/es that this applies to. Oppropriate, provide any additional information ntext to the answers in this section.	
85 b If app / con 10. SANCTIC 86 Does approvith inclument inclume	te to and the branch/es that this applies to. propriate, provide any additional information ntext to the answers in this section.	
10. SANCTIC 86 Does approvith: including with, finan 87 Does other the uring a right sancentity	ntext to the answers in this section. ONS	
86 Does approvith: inclument with, finan 87 Does other the urin ar sancentity		
86 Does approvith: include with, finan 87 Does other the u in a r sanc entity		
87 Does other the u in a r sanc entity	is the Entity have a Sanctions Policy roved by management regarding compliance sanctions law applicable to the Entity, uding with respect its business conducted, or through accounts held at foreign notal institutions?	Yes
	is the Entity have policies, procedures, or er controls reasonably designed to prevent use of another entity's accounts or services manner causing the other entity to violate ctions prohibitions applicable to the other by (including prohibitions within the other ty's local jurisdiction)?	Yes
other and/o sanc result relev	is the Entity have policies, procedures or er controls reasonably designed to prohibit /or detect actions taken to evade applicable ctions prohibitions, such as stripping, or the libmission and/or masking, of sanctions vant information in cross border sactions?	Yes
89 Does bene Entity	s the Entity screen its customers, including	Yes
	at is the method used by the Entity?	Combination of automated and manual
data, infor	is the Entity screen all sanctions relevant a, including at a minimum, entity and location rmation, contained in cross border sactions against Sanctions Lists?	Yes
	at is the method used by the Entity?	Combination of automated and manual
	ect the Sanctions Lists used by the Entity in anctions screening processes:	
Sand	solidated United Nations Security Council ctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
Office	ed States Department of the Treasury's ce of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
HMT	ce of Financial Sanctions Implementation (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
	opean Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
	s maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
93 f Othe	er (specify)	
94 Ques	estion removed	
	en regulatory authorities make updates to r Sanctions list, how many business days	

95 a	Customer Data	Same day to 2 business days
95 b	Transactions	Same day to 2 business days
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
11. TRA	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 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	Yes
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
	ALITY ASSURANCE /COMPLIANCE TEST	ING
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes

105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information	
100 5	/ context to the answers in this section.	
13. AUI	DIT	
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	Yes
	practices on a regular basis?	
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	Component based reviews
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	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.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	
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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)

Bank of Beirut (UK) Ltd							
	 	 V + 7 H	 	 			

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

	 -inancial Institution name) is fully committed to the ancial crime laws, regulations and standards in al 	e tight against financial crime and makes of the jurisdictions in which it does business and holds accounts.
The Financial Institution understands the critical importance of and regulatory obligations.	of having effective and sustainable controls to con	nbat financial crime in order to protect its reputation and to meet its legal
The Financial Institution recognises the importance of transportance standards.	arency regarding parties to transactions in interna	tional payments and has adopted/is committed to adopting these
The Financial Institution further certifies it complies with / is w information provided in thisWolfsberg CBDDQ will be kept cu		ent Banking Principles and the Wolfsberg Trade Finance Principles. The on an annual basis.
The Financial Institution commits to file accurate supplement	al information on a timely basis.	
Sophoklis Argyrou		
I,answers provided in this Wolfsberg CBDDQ are complete an		valent), certify that I have read and understood this declaration, that the rised to execute this declaration on behalf of the Financial Institution.
Rollo Greenfield	(MLRO or equivalent), certify that I have read an	d understood this declaration, that the answers provided in this
Wolfsberg CBDDQ are complete and correct to my honest be		
28TH MAY 2020	Signature & Date)	
28TH MAY 2020	Signature & Date)	Calab