## the Wolfsberg Group

Financial Institution Name: Location (Country) :

CARTU BANK, JSC	,
GEORGIA	

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
and the second second	* OWNERSHIP	
1	Full Legal Name	
	l un Logar Hamo	"Cartu Bank" Joint Stock Company (JSC)
	1.	*
	,	
•	Append a list of foreign branches which are covered	
2	by this questionnaire	N/A
	by this questionnaire	a e
3	Full Legal (Registered) Address	39a, Ilia Chavchavadze Ave., Tbilisi - 0162, Georgia
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	01.11.1996
	a d	
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	
1001	beneficial owners with a holding of 10% or more	Mr. Uta Ivanishvili (35 %), Citizen of Georgia,
		France
	0 (0 5 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
7	% of the Entity's total shares composed of bearer	0%
	shares	
8	Does the Entity, or any of its branches, operate under	No 🔻
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	,
9	Does the Bank have a Virtual Bank License or	No V
	provide services only through online channels?	
10	Name of primary financial regulator/supervisory	National Bank of Georgia
	authority	
11	Provide Legal Entity Identifier (LEI) if available	2549004OXVRVI1I3IS40
12	Provide the full legal name of the ultimate parent (if	CARTU GROUP JSC
	different from the Entity completing the DDQ)	
1		
l		

13	Jurisdiction of licensing authority and regulator of ultimate parent	Georgia
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No .
14 h	Broker/Dealer	No No
14 i	Multilateral Development Bank	No 🔽
14 j	Wealth Management	Yes
14 k	Other (please explain)	N/A
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 different jurisdiction to the location where bank services are provided)	No .
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Greater trial \$500 million
17	Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PRODU	JCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a		
	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b		Yes No
19 a1b	services to domestic banks?  Does the Entity allow domestic bank clients to	
200. 200000	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	No I
19 a1c	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	No Yes
19 a1c	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 Yes Yes
19 a1c 19 a1d 19 a1e	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	No Yes Yes No
19 a1c  19 a1d  19 a1e  19 a1f  19 a1g	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 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 Yes Yes  Yes  Ves  Ves
19 a1c 19 a1d 19 a1e 19 a1f	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 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 Yes Yes  Yes  Ves  Ves
19 a1c  19 a1d  19 a1e  19 a1f  19 a1g	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 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 Yes  Yes  No You Yes  No You Yes  No Yes

19 a1i	Does the Entity have processes and procedures	Test test test test test test test test
	in place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	in the second se
19 e	Hold Mail	Yes No
19 f	International Cash Letter	
19 g	Low Price Securities	No -
		No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select  Please select
19 i4	eCommerce Platforms	
19 15	Other - Please explain	Please select
	and the same of th	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 р	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a		No -
19 p2	If yes, state the applicable level of due diligence Wire transfers	Please select
19 p2a	If yes, state the applicable level of due diligence	Yes
19 p2a	Foreign currency conversion	Identification and verification
19 p3a	If yes, state the applicable level of due diligence	Yes
19 p3a	Sale of Monetary Instruments	Identification and verification
19 p4a	If yes, state the applicable level of due diligence	No Elease select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	N/A
19 q	Other high-risk products and services identified by the Entity (please specify)	Safe Deposit Boxes
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.	.*
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	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 i 22 i	Policies and Procedures PEP Screening	Yes Yes
22 j	PEP Screening	Yes
22 i 22 j 22 k 22 l		

22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	200
22 o	Transaction Monitoring	Yes	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10	•
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.	Yes	•
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	~
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	~
26 a	If Y, provide further details		
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	-
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI	BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	•
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	•
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	•
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	~
34	Is the Entity's ABC programme applicable to:	Not Applicable	-
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 improperly intended to influence action or obtain an advantage.	Yes	
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	V
35 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	~
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 reporting on the status of the ABC programme?	Yes	·
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	No	v
38 a	If N, provide the date when the last ABC EWRA was completed.	While the Law of Georgia does not mandate an ABC EWRA, our ABC Policy prohibits corrupt activities and aims to mitigate reputational and legal risks. Regular risk assessments are conducted under this policy, covering all key aspects from the WQ (4 ABC - Anti Bribery & Corruption).	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	~
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	~
	Potential liability created by intermediaries and		=

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	•
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	~
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	•
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	~
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	No	Y
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	Description of
42 b	1st Line of Defence	Yes	loo.
42 c	2nd Line of Defence	Yes	men.
42 d	3rd Line of Defence	Yes	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	Ť
42 f	Non-employed workers as appropriate (contractors/consultants)	No .	•
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	•
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	•	
45	If appropriate, provide any additional information/context to the answers in this section.		
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	
46 b	Terrorist financing	Yes	
46 c	Sanctions violations	Yes	
47	Are the Entity's policies and procedures updated at least annually?		V
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	
48 a1	If Y, does the Entity retain a record of the results?	Yes	
48 b	EU Standards	Yes	-
48 b1	If Y, does the Entity retain a record of the results?	Yes	
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	7
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<b>-</b>
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	V
49 d	Prohibit accounts/relationships with shell banks	Yes	0000-6
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	7
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<b>-</b>
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Yes	

1401	I D. C	
49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	100
		5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6. AML, CT	FF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	。 第二章
54 a	Client	Yes
54 b 54 c	Product	Yes
54 d	Channel Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d 55 e	Transaction Screening  Name Screening against Adverse Media/Negative News	Yes Yes
55 f		
55 g	Training and Education  Governance	Yes Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	No V
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	While the Law of Georgia does not mandate an AML & CTF EWRA, these topics are thoroughly addressed in the NBG's report, which includes a comprehensive analysis of our clients, products, channels, geography, transaction monitoring, and other relevant elements, similar to an EWRA
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	I Due donat	Yes
	Product	
	Channel	Yes
57 d	Channel Geography	
57 c 57 d 58	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Programme Pr
57 d 58 58 a	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes
57 d 58 58 a 58 b	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes Yes Yes Yes
57 d 58 58 a	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes

58 e	Name Screening	Von	
58 f	Transaction Screening	Yes Yes	7
58 g	Training and Education	Yes	2000
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	No .	~
59 a	If N, provide the date when the last Sanctions EWRA was completed.	While the Law of Georgia does not mandate a Sanctions EWRA, these topics are thoroughly addressed in the NBG's report. Additionally, our AML/CTF policy covers all key aspects of sanctions-related risks	100000
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.		- Committee
61	If appropriate, provide any additional information/context to the answers in this section.		
7. KYC, (	CDD and EDD		
62	Does the Entity verify the identity of the customer?	Yes	nema (
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	<b>\</b>
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	200
64 b	Expected activity	Yes	Acres de
64 c 64 d	Nature of business/employment	Yes	THE R. P. LEWIS CO., LANSING
64 e	Ownership structure Product usage	Yes	A.
64 f	Purpose and nature of relationship	Yes	property of
64 g	Source of funds	Yes Yes	
64 h	Source of wealth	Yes	12000
65	Are each of the following identified:	100	
65 a	Ultimate beneficial ownership	Yes	
65 a1	Are ultimate beneficial owners verified?	Yes	K A
65 b	Authorised signatories (where applicable)	Yes	B. A
65 c	Key controllers	Yes	per le c
65 d	Other relevant parties	Yes	photo:
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%	•
67	Does the due diligence process result in customers receiving a risk classification?	Yes	$\checkmark$
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1 67 a2	Product Usage Geography	Yes	STEEN S
67 a2	Business Type/Industry	Yes Yes	2000
67 a4	Legal Entity type	Yes	Colombia
67 a5	Adverse Information	Yes	<b>N</b> 4
67 a6	Other (specify)	N/A	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	lacksquare
68 a	If Y, is this at:		
68 a1	Onboarding	Yes	V
68 a2 68 a3	KYC renewal	Yes	
68 a4	Trigger event Other	Yes No	
68 a4a	If yes, please specify "Other"		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	>
69 a	If Y, is this at:		
69 a1 69 a2	Onboarding	Yes	200000
99 a2	KYC renewal	Yes	Access to

69 a3	Trigger event	Yes	
70	What is the method used by the Entity to screen for		
71	Adverse Media/Negative News?  Does the Entity have a risk based approach to screening	Combination of automated and manual	
	customers and connected parties to determine whethe they are PEPs, or controlled by PEPs?	Yes	
71 a	If Y, is this at:		BIG
71 a1	Onboarding	Yes	100
71 a2	KYC renewal	Yes	200
71 a3	Trigger event	Yes	100
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	1
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	
74 a	If yes, select all that apply:		
74 a1	Less than one year	Yes	200000
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	1
74 a4	5 years or more	Yes	_
74 a5	Trigger-based or perpetual monitoring reviews	Yes	ı.
74 a6	Other (Please specify)	N/A	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
76 a	Arms, defence, military	Restricted	
76 b	Respondent Banks	Always subject to EDD	N.
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	-
76 c	Embassies/Consulates	Always subject to EDD	V
76 d	Extractive industries	EDD on risk-based approach	
76 e	Gambling customers	Always subject to EDD	
76 f	General Trading Companies	Always subject to EDD	
76 g	Marijuana-related Entities	Prohibited	V
76 h	MSB/MVTS customers	Always subject to EDD	
76 i	Non-account customers		<b>I</b>
T 10 10 10 10 10 10 10 10 10 10 10 10 10		EDD on risk-based approach	1
76 j	Non-Government Organisations	EDD on risk-based approach	
76 k	Non-resident customers	EDD on risk-based approach	
761	Nuclear power	Prohibited	N.
76 m	Payment Service Providers	Always subject to EDD	1
76 n	PEPs	Always subject to EDD	1
76 o	PEP Close Associates	Always subject to EDD	
76 p	PEP Related	Always subject to EDD	
76 q	Precious metals and stones	EDD on risk-based approach	I.
76 r	Red light businesses/Adult entertainment	Prohibited	7
76 s	Regulated charities	Always subject to EDD	
76 t	Shell banks	Prohibited	
76 u	Travel and Tour Companies	EDD on risk-based approach	
76 v	Unregulated charities	Prohibited	_
76 w	Used Car Dealers	EDD on risk-based approach	
76 x	Virtual Asset Service Providers	and the state of t	N.
76 y	Other (specify)	Always subject to EDD  Gambling activities not licensed or regulated by local authorities or authorized in non-EEA countries are strictly prohibited  The National Bank of Georgia has recently adopted registration rules for companies engaged cryptocurrency activities. The Bank permits transactions for companies in the cryptocurrency business only if they are duly registered with the National Bank	in
77	If restricted, provide details of the restriction	The our database, we have identified just two customers involved in manufacturing military cloth We are proactively managing AML risks related to these customers.	_
78	Does EDD require senior business management and/ or compliance approval?	Yes	V

processes to comply with suspicious transaction reporting requirements?  86 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?  87 Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?  88 Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  89 Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?  90 Confirm that all responses provided in the above Section are representative of all the LE's branches Section are representative of all the LE's branches and the branch/es that this applies to  91 If appropriate, provide any additional information/context to the answers in this section.	
onboarding entitles that handlo client money such as lawyers, accountaints, real estate agents?  Does the Entity perform an additional control or untilly receive an clients subject to EDD?  Confirm that all responses provided in the above and the subject to EDD?  Confirm that all responses provided in the above and the subject to EDD?  The analysis of the analysis of the above and the branchies that this applies to  If a Including which quositions in additional information/context to the answers in this section.  EMONITORING & REPORTING  Does the Entity have risk based policies, procedures and encontrolloring processes for the identification of experiments of the experiment of the section of experiments of the experiment of the experiments to report aspiclated and experiments to experiment of the experiments of t	500
Bayers, accountable, consultants, cale stake agentary	
quality review or orients subject to EDD?  1 Confirm that all response provided in the above Section are representative of all the LE's branches  1 a I Right provide any additional information context to the answers in this section.  2 I Repropriate, provide any additional information context to the answers in this section.  2 I Repropriate, provide any additional information context to the answers in this section.  3 Does the Entity have risk based policies, procedures and monitoring processes for heidenfill called and reporting of suspicious activities?  4 What is the method used by the Entity to monitor transactions for suspicious activities?  5 I Manual incombination selected, specify what type of transactions for suspicious activities?  5 I Authority of transactions are monitored manually the original processes are provided and suspicious activities.  5 I Manual monitoring processes to relieve and incombination selected, are internal system or vendor-sourced tools used?  5 If vendor-sourced tool or 1801/8 selected, what is the name of the vendorhool?  5 If vendor-sourced tool or 1801/8 selected, what is the name of the vendorhool?  5 If vendor-sourced tool or 1801/8 selected, what is the name of the vendorhool?  5 Obes the Entity have regulatory requirements to report supplication has calibrated?  5 Does the Entity have policies, procedures and processes to review and complete deals for all transactions are subject to mother origing requirements?  6 Does the Entity have policies, procedures and processes to review and complete deals for all transactions are subject to mother origing requirements?  6 Does the Entity have processes in place to send Naviges for information (PKPs) from other critics are formation or are presentative of all the LES beneficies to and the branches that this applies to review to the formation of all the LES beneficies to and the branches that this applies to review to the work to the anomal information occords to the Work to the anomal information occords to the Work to the anomal	
Section are representative of all file LEs branches If I a Section are representative of all file LEs branches If I appropriate, provide any additional information/context to the enswers in this section.  S. MONITORING & REPORTING  Combination of subdivision of subdi	
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91 a The Carlot which questions the differences relate to and the branches that this applies to the procedures and nonlinoing processes for the identification and reporting of suspicious activity?  92	1000
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IPayment Transparency Standards?	
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93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b		Yes
93 b1	Local Regulations  If Y, specify the regulation	Law of Georgia on Facilitating the Suppression of Money Laundering and Terronsm Financing; Regulation on Approval of the Procedure of Identification and Verification of a Customer by Obliged Entity. Regulation on Approval of the Rule on Record-keeping, Storage and Reporting of the Information on the Transaction by Obliged Entity to the Financial Monitoring Service of Georgia.
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	World Check, Accuity and Dow Jones
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Door the Entity have a data will	
100	Does the Entity have a data quality management programme to ensure that complete data for all	
	transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
1.00	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Used for coroning quaternous and houseful and the first transfer of the first transfer o
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
100 C	Office of Financial Sanctions Implementation HMT (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)	N/A
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. 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
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 ь	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
	ior the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes Yes
111 c	Internal policies for controlling money laundering,	
	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant	Yes
111 d 111 e 111 f	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes Yes
111 d 111 e 111 f 112	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:	Yes Yes Yes
111 d 111 e 111 f 112	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes Yes Yes
111 d 111 e 111 f 112 112 a 112 b	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes
111 d 111 e 111 f 112 112 a 112 b	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
1111 d 1111 e 1111 f 112 112 a 112 b 112 c 112 d	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence	Yes Yes Yes Yes Yes Yes Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes Yes Yes Yes Yes Yes Yes Yes Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)	Yes
111 d 111 e 111 f 12 12 a 12 b 12 c 12 d 12 e	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	Yes
111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 e 113 1 14	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML,	Yes
111 d 111 e 111 f 112 a 112 a 112 b 112 c 112 d 112 e 112 f 113	Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes

and the branchies that this applies to.  If appropriate, provide any additional information content to the answers in this section.  If appropriate, provide any additional elegander of the provided and the prov			
Information/context to the answers in this section.	115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
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Does the Entity have a program wide risk based Quality Assurance programs for familial care (separate from the independent Audit function)?  118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?  119 Confirm that all responses provided in the above Section are representately of all the LES branches.  119 a If N, Clarify which questions the difference's relate to and the branches that this applies to.  119 a If appropriate, provide any additional information context to the answers in this section.  120 If appropriate, provide any additional minor the above of the above of the application of the appli	12 OHALI	TV ACCUIDANCE (COMPLIANCE TECTIVO	
Coultry Assurance programme for financial crime (exparted from the independent Audit (unction)?  118			
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Section are representative of all the LE's branches  If a group state in the LE's branches  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information information/context to the answers in this section.  If appropriate, provide any additional information information/context to the answers in this section.  If appropriate, provide any additional information information information/context to the answers in this section.  If a provided in the provide any additional information information/context to the answers in this section.  If a provided in the LE's branches in the LE's branches in the provided in provided any additional information inform		Compliance Testing process (separate from the independent Audit function)?	Yes
and the branchies that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If addition is inspections by the government in the applies of the provide any additional information/context to the answers in this section.  If addition is inspections by the government internal audit function a testing function or other independent third party over the following areas:  If a discontinual internal audit party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party over the following areas:  If a discontinual internal audit function or other independent third party of the function of the func	95 NO.54		Yes
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122 b External Third Party  Does the Entity have policies in place addressing fraud in SVP server  External Third Party  Yearry  Yearry  Yearry  Yearry  Yes  123 a Does the Entity have policies in place addressing fraud in SVP server  124 b External Third Party  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye	122		
123   Does the internal audit function or other independent third party cover the following areas:		Internal Audit Department	Yearly
Title party cover the following areas:   AML, CTF, ABC, Fraud and Sanctions policy and procedures   Yes			
procedures    Procedures   Proc		third party cover the following areas:	
123 c Governance Yes		procedures	Yes
123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 h Technology 123 j Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Training & Education 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completion and assessed for adequacy and completion are representative of all the LE's branches 125 a Confirm that all responses provided in the above section are representative of all the LE's branches 126 a If appropriate, provide any additional information/context to the answers in this section.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.  As mentioned above in sections 38a, 56a, and 59a, the Law of Georgia does not mandate an EWRA.		•	
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127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	14. FRAU		
The state of the s		Does the Entity have policies in place addressing	Yes
por protoning a dotooning nada:	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		
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		
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes		
131 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	,		
132	If appropriate, provide any additional information/context to the answers in this section.			
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)				
CARTU BANK, JSC  (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 every eighteen months.				
The Financial Institution commits to file accurate supplemental information on a timely basis.				
I. Giorgi Tripolski (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				
, Nino Dolid Wolfsberg CB	(MI RC) or equiv	ralent), certify that I have read and understood this declaration, that the answers provided in this mauthorised to execute this declaration on behalf of the Financial Institution.  24.12.2024		
6/3	(Signature & Date	24,12,2024 (CARTUBANK)		