### the Wolfsberg Group

Financial Institution Name: Location (Country) : Allied Bank Limited Pakistan

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
ENTITY	& OWNERSHIP	The state of the s
1	Full Legal Name	Allied Bank Limited
	Append a list of foreign branches which are covered by	All branches of Allied Bank Limited
2	this questionnaire	All branches of Allied Bank Limited
3	Full Legal (Registered) Address	3 - Tipu Block, Main Boulevard New Garden Town, Lahore - Pakistan.
4	Full Primary Business Address (if different from above)	Same as above
5	Date of Entity incorporation/establishment	3rd December, 1942
6	Select type of ownership and append an ownership chart	
ь	if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes, (Publicly Traded with free float of less than 25%)
6 a1	If Y, indicate the exchange traded on and ticker symbol	Stock Exchange: Pakistan Stock Exchange Limited, Pakistan
SANSES .		Ticker Symbol: ABL
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes - Ibrahim Holdings (Private) Limited.  Mohammad Naeem Mukhtar
	If V are side details of shareholders or ultimate beneficial	Muhammad Waseem Mukhtar
6 d1	If Y, provide details of shareholders or ultimate beneficial	Mulianina vyaseen Mukikai
	owners with a holding of 10% or more	Through Ibrahim Holdings (Private) Limited.
195	Les Bires and Allino Processes of the Control of th	The state of the s
7	% of the Entity's total shares composed of bearer shares	Not Applicable ,
	Does the Entity, or any of its branches, operate under an	
8	Offshore Banking License (OBL)?	Yes
	If Y, provide the name of the relevant branch/es which	Miles and Branch Bahasia and Franch Processing Zono Propos
8 a	operate under an OBL	Wholesale Branch Bahrain and Export Processing Zone Branch
	Does the Bank have a Virtual Bank License or provide	No
9	services only through online channels?	NO .
10	Name of primary financial regulator/supervisory authority	State Bank of Pakistan (SBP)
10		POTENTIAL AND THE PLANT OF THE
11	Provide Legal Entity Identifier (LEI) if available	529900X6XIDYH83WGV81
12	Provide the full legal name of the ultimate parent (if	Ibrahim Holdings (Private) Limited.
12	different from the Entity completing the DDQ)	
13	Jurisdiction of licensing authority and regulator of ultimate	Jurisdiction: Pakistan
	parent	Regulator of Ultimate Parent: Securities and Exchange Commission of Pakistan (SECP).
14	Select the business areas applicable to the Entity	•
14 a	Retail Banking	Yes
14 b	Private Banking	No .
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes (Safe Deposit Lockers for Customers Only)
14 h	Broker/Dealer	No .
14 i	Multilateral Development Bank	No .
14 j	Wealth Management	No
14 k	Other (please explain)	•
	Does the Entity have a significant (10% or more) portfolio	a de la companya de l
	of non-resident customers or does it derive more than	3
15	10% of its revenue from non-resident customers? (Non-	No
	resident means customers primarily resident in a different	
	jurisdiction to the location where bank services are	
	provided)  If Y, provide the top five countries where the non-resident	
15 a	customers are located.	Not Applicable
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
10 0	Confirm that all responses provided in the above Section	,
17	are representative of all the LE's branches.	Yes
	If N, clarify which questions the difference/s relate to and	
17 a	the branch/es that this applies to.	Not Applicable
	If appropriate, provide any additional information/context	1
18	to the answers in this section.	Nil

2. PRODUC	CTS & SERVICES	
19	Does the Entity offer the following products and services:	· · · · · · · · · · · · · · · · · · ·
	<u> </u>	•
	Correspondent Banking	Yes
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	[downstream relationships?	Not Applicable
	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Not Applicable
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	PKR based Vostro services are provided to licensed and regulated Banks for Inward Home Remittances only; as per regulatory guidelines. (Further, RMA relationships only for SWIFT Correspondence)
	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Value Transfer Services (MVTSs)?	PKR based Vostro services are provided to licensed and regulated Exchange Companies for Inward Home Remittances only; as per regulatory guidelines.
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	·
19 a1h1		No
19 a1h2 19 a1h3	MVTSs PSPs	NoNo
19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs //MVTSs/PSPs?	Yes
19 b		No
19 c 19 d	Cross-Border Remittances	Yes , , , , , , , , , , , , , , , , , , ,
19 a		No
19 f		No
19 g		No
19 h	7	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 11	If Y , please select all that apply below?	Nick A - disabba
19 i2 19 i3	Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs)	Not Applicable , Not Applicable
19 i4		Not Applicable
19 ì5	Other - Please explain	Not Applicable
19 j	Private Banking	No
19 k		No
191		No
19 m		No
19 n 19 o		Yes
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable	-
40 :-4	level of due diligence:	Vaa
		Yes Due Diligence
19 p1a 19 p2	Wire transfers	Yes (Home Remittances Only)
	If yes, state the applicable level of due diligence	Due Diligence
19 p3		No
19 p3a	If yes, state the applicable level of due diligence	Not Applicable ,
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Due Diligence
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	ABL offers cash deposit and withdrawal, remittances payment, banking instrument issuance, institutional fee collection and utility bill collection services etc. to walk-in customers. Services to walk in customers are provided in line with regulatory guidelines; subject to performance of Enhance Due Diligence which includes but not limited to Customer' identification/ verification, purpose of transaction, name screening, source / ultimate utilization of funds etc., as the case may be. In addition, services/transactions are also weighed against any real time scenarios such as transactions which do not make any economic sense or bears any suspicion etc.
19 q	Other high-risk products and services identified by the Entity (please specify)	No
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.	Not Applicable
21	If appropriate, provide any additional information/context to the answers in this section.	Nil

to the answers in this section.  4. ANTI BRIBERY & CORRUPTION  Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise to implement the ABC programme?  Does the Entity have a dedquate staff with appropriate levels of experience/expertise to implement the ABC programme?  Third parties acting on behalf of the Entity  Third parties acting on behalf of the Entity  ABL as a Commercial Bank malnly deals in services covers ABC risk through Code of Ethics duly at the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat separate fraud monitoring a reporting unit for on-going monitoring of staff activities while an independance and independance of the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat separate fraud monitoring a reporting unit for on-going monitoring of staff activities while an independance has set in the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat separate fraud monitoring as reporting unit for on-going monitoring of staff activities while an independance in the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat separate fraud monitoring as reporting unit for on-going monitoring of staff activities while an independance of the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat separate fraud monitoring as reporting unit for on-going monitoring of staff activities while an independance of the Board of Directors, every employee signs off the same on annual basis. Further, bank has estated the B		CTIONS DEOCRAMME	AMI OTE
AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise  22 b Advisor information Scenarion  22 c Appointed Officer with sufficient experience/expertise  23 c Cash Reporting  24 c Cash Reporting  25 c Cash Reporting  26 c Cash Reporting  27 c Cash Reporting  28 c Cash Reporting  29 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  21 c Cash Reporting  22 c Cash Reporting  23 c Cash Reporting  24 c Cash Reporting  25 c Cash Reporting  26 c Cash Reporting  27 c Cash Reporting  28 c Cash Reporting  29 c Cash Reporting  29 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  21 c Cash Reporting  22 c Cash Reporting  23 c Cash Reporting  24 c Cash Reporting  25 c Cash Reporting  26 c Cash Reporting  27 c Cash Reporting  28 c Cash Reporting  29 c Cash Reporting  29 c Cash Reporting  29 c Cash Reporting  20 c Cash Reporting  21 c Cash Reporting  22 c Cash Reporting  23 c Cash Reporting  24 c Cash Reporting  25 c Cash Reporting  26 c Cash Reporting  27 c Cash Reporting  28 c Cash Reporting  29 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  21 c Cash Reporting  22 c Cash Reporting  23 c Cash Reporting  24 c Cash Reporting  25 c Cash Reporting  26 c Cash Reporting  27 c Cash Reporting  28 c Cash Reporting  29 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  20 c Cash Reporting  20 c Cash Re			
22 b. Advarse Information Screening Yes 22 d. Cash Reporting Yes 23 d. Cash Reporting Yes 24 d. Cash Reporting Yes 25 d. Cash Reporting Yes 22 d. Cash Reporting Yes 22 d. Programmer Testing Yes 23 d. Programmer Testing Yes 24 d. Programmer Testing Yes 25 d. Programmer Testing Yes 26 d. Programmer Testing Yes 27 d. Programmer Testing Yes 28 d. Programmer Testing Yes 29 d. Programmer Testing Yes 29 d. Programmer Testing Yes 20 d. Programmer Testing Yes 20 d. Programmer Testing Yes 21 d. Programmer Testing Yes 22 d. Programmer Testing Yes 23 d. Programmer Testing Yes 24 d. Programmer Testing Yes 25 d. Programmer Testing Yes 26 d. Programmer Testing Yes 27 d. Programmer Testing Yes 28 d. Programmer Testing Yes 29 d. Programmer Testing Yes 20 d. Programmer Testing Yes 29 d. Programmer Testing Yes 20 d. Programmer Testing Yes 20 d. Programmer Testing Yes 20 d. Programmer Testing Yes 21 d. Programmer Testing Yes 22 d. Programmer Testing Yes 23 d. Programmer Testing Yes 24 d. Programmer Testing Yes 25 d. Programmer Testing Yes 26 d. Programmer Testing Yes 27 d. Does the entity Nava a whiteletiover policy? 28 d. Programmer Testing Yes 28 d. Programmer Testing Yes 29 d. Programmer Testing Yes 29 d. Programmer Testing Yes 20 d. Programmer Testing Yes 20 d. Programmer Testing Yes 21 d. Programmer Testing Yes 22 d. Programmer Testing Yes 23 d. Programmer Testing Yes 24 d. Programmer Testing Yes 25 d. Programmer Testing Yes 26 d. Programmer Testing Yes 27 d. Programme	•	and Sanctions standards regarding the - omponents:	22 A
22 d Senéficial Overeship Yes 22 d CDD Yes 22 D CDD Yes 22 D Independent Testing Yes 22 D Testings and Encodures Yes 22 D Testings and Encodures Yes 22 D Senetions Yes 22 D Senetions Yes 22 D Testings and Education Yes 23 D Testings and Education Yes 24 D Testings and Education Yes 25 D Testings and Education Yes 26 D Testings ANL CTF & Seniorions policy approved at least annually by the Board or equivalent Senior Management Committee IV III, describe your practice in Outsidon 29. Does the Entity a NUL CTF & Seniorions policy approved at least annually by the Board or equivalent Senior Management Committee IV III, describe your practice in Outsidon 29. Does the Board riceivs, assess, and challenge regular Correspondence & Remittances Units  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Senior Management on monthly basis.  Yes, Board on quarterly basis while Se			
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22   CDD   Yes			
Yes   Periodic Review   Yes			
22 ft   Projecte And Procedures   Yes   22 1			
22 in Periodic Review Yes 22 in PEP Screening Yes 22 in PEP Screening Yes 22 in Sanctions Yes 22 in Sanctions Yes 22 in Sanctions Yes 22 in Training and Education Yes 23 in Sanctions Yes 24 in Training and Education Yes 25 in Training and Education Yes 26 in Training and Education Yes 27 in Sanctions Compliance Department? Yes 28 in Sentity's AML, CTF & Sanctions plots approved at least annually by the Board or equivalent Senior Amangement Committee? If N, describe your practice in No Question 29. Ones the Board receive, assess, and challenge regular reporting on the status of the AML, CTF. & Sanctions programme? 29 components of its AML, CTF & Sanctions programme? 20 components of its AML, CTF & Sanctions programme? 21 in Yes 22 in Sanctions 23 in Yes 24 in Yes 25 in Yes 26 components of its AML, CTF & Sanctions programme? 27 Does the entity have a whiteletower policy? 28 in Yes 29 in Yes 20 components of its AML is applied to an one that the programme in this section. 31 Does the Entity have an enterprise wide programme that sets minimum ASC standards? 32 committee of the Board receiver in this section. 33 levels of the Earth Sanctions programme in that sets in this section. 34 In Yes demand the Sanctions programme in that sets in this section. 35 Does the Entity have an enterprise wide programme that sets minimum ASC standards? 36 Ves 37 Does the Entity have an enterprise wide programme that sets minimum ASC standards? 38 levels of experimenications and procedures consistent with applicable ASC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 39 Components of the Entity have an enterprise wide programme that sets minimum ASC standards? 30 Levels of the Entity have an enterprise wide programme that sets minimum and the programme in that sets in this section. 31 Does the Entity have an enterprise wide programme in that sets in this section. 31 Level Entity have an ente			
221 Policies and Procedures  22 R Risk Assessment  Yes  22 In Suspicious Activity Reporting  Yes  22 In Transaction Monitoring  Yes  22 In Transaction Monitoring  Yes  23 In Transaction Monitoring		<del></del>	
22   FEF Screening Yes 22   A Sanctions Yes 23   A Sanctions Yes 24   A Sanctions Yes 25   A Sanctions Yes 26   A Sanctions Yes 27   A Sanctions Yes 28   A Sanctions Yes 29   A Sanctions Yes 29   A Sanctions Yes 20   A Sanctions Yes 20   A Sanctions Yes 20   A Sanctions Yes 20   A Sanctions Yes 21   A Sanctions Yes 22   A Sanctions Yes 23   A Sanctions Yes 24   A Sanctions Yes 25   A Sanctions Yes 26   A Sanctions Yes 27   Does the Board creave, assess, and challenge regular reporting on the status of the AMIL CTF. & Sanctions Programme? 26   Does the Board creave, assess, and challenge regular reporting on the status of the AMIL CTF. & Sanctions Programme? 26   Does the Board creave, assess, and challenge regular reporting on the status of the AMIL CTF. & Sanctions Programme? 27   Does the Entity see third parties to carry out any 28   Order the Sanctions Programme? 29   Does the entity have a whisteblower policy? Yes 20   Confirm that all responses provided in the above Section are representative of a supersensitive of a suppression of the Sanctions of requirements to reasonably prevent, detect and report bribery and corruption? 31   Does the Entity have an enterprise wide programme that sets minimum A&C standards? 32   Does the Entity have a enterprise wide programme that sets minimum A&C standards? 33   Sevice of Sanctions of Sanctions of Sanctions of Programme Sanct			
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23 Transaction Monitoring 23 Transaction Monitoring 25 Transaction Monitoring 26 Compliance Department? 27 Compliance department has 254 staff members of which 90 are dedicated to AML, KYC, CFT and I Correspondence & Remittances Units 28 Transaction Monitoring 29 Construction in Monagement Committee? If It, describe your practice in Ouestion 29. 29 Cost the Board receive, assess, and challenge regular reporting on the status of the AML, CFT, & Sanctions programme? 26 Components of its AML, CFT & Sanctions programme? 26 Components of its AML, CFT & Sanctions programme? 27 Cost the entity have a winistellower policy? 28 Confirm that all responses provided in the above Section for the analysis of the sanches and if its CFT & Sanctions programme? 29 If appropriate, provide any additional information/context to the answers in this section. 30 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 31 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 32 All is the Entity should be applicable for condinating the ABC programme? 33 Does the Entity have an enterprise wide programme that sets minimum ABC standards? 34 Is the Entity should be applicable for condinating the ABC programme? 35 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 35 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 36 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 37 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 38 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 39 Consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribe		··	
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Correspondence & Remittances Units  Is the Entity San (CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Ouestine 29.  Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?  26 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?  26 a If Y, provide further details  27 Does the Entity was whiteleblower policy?  28 Confirm that all responses provided in the above Section are representative of all the LFs branches  29 a If appropriate, provide any additional information/context to the answers in this section.  41 ANTI BRIBERY & CORRUPTION  Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements for easonably prevent, detect and probability of the Board of Directors, every employee signs off the same on a natural basis. Further, back has estain and concilinating the ABC programme?  30 Does the Entity have an enterprise wide programme that set minimum ABC standards?  Has the Entity appointed a designated officer or officers with sufficient experience/septreits expossible for coordinating the ABC programme?  Does the Entity have a enterprise wide programme that set minimum ABC programme?  Does the Entity have a decivate staff with appropriate (evels of experience/expertise to implement the ABC programme?  Does the Entity have a decivate staff with appropriate (evels of experience/expertise to implement the ABC programme?  ABC possible for programme applicable to:  Third parties acting on behalf of the Entity  Third parties acting on behalf of the Entity  Third parties acting on behalf of the Entity  Does the Entity have a global ABC policy that:  Prohibits the giving and receiving of bribes? This includes promising, offering, citying, solicitation or receiving of anything of value, directly or indirectly, in includes promising, offering, citying, solicitation or rece	d International		
least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.   Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?   26	•	actions Compliance Department? Correspondence & Remittances Units	23 C
25 reporting on the status of the AML, CTF, & Sanctions programme?  26 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?  27 Does the entity have a whistleblower policy?  28 a If Y, provide curve of all the LE's branches  29 If appropriate, provide any additional information/context to the answers in this section.  29 If appropriate, provide any additional information/context to the answers in this section.  4. ANTI BRIBERY & CORRUPTION  Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report oribery and corruption?  30 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  Has the Entity have an enterprise wide programme that sets minimum ABC standards?  31 Does the Entity have a dequate staff with appropriate (sevels of experience/expertise responsible for programme?)  31 Does the Entity have a dequate staff with appropriate (sevels of experience/expertise to implement the ABC programme?)  32 Does the Entity have a global ABC policy that:  33 Prohibits the giving and receiving of histes? This includes prohibition against the falsification of books in an advantage includes a prohibition against the falsification of books in cluddes enhanced requirements regarding interaction with pulpicionition against the falsification of books in cluddes enhanced requirements regarding interaction with pulpicionition against the falsification of books in cluddes enhanced requirements regarding interaction with pulpicionition against the falsification of books in cluddes enhanced requirements regarding interaction with pulpicionition against the falsification of books in cluddes enhanced requirements regarding interaction with pulpicionition against the falsification of books in the proper interaction of books in an advantage.		ally by the Board or equivalent Senior ent Committee? If N, describe your practice in 19.	24   le N C
25 a if Y, provide further details Not Applicable 26 a if Y, provide further details Not Applicable 27 Does the entity have a whistleblower policy? 28 are representative of all the LE's branches 29 a if N, clarify which questions the difference/s relate to and the branch/es that this applies to the answers in this section.  29 a if Annual Bribery & CORRUPTION  Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  AL as a Commercial Bank mainly deals in services covers ABC risk through Code of Ethics duly a the Board of Directors, every employee signs off the same on annual basis. Further, bank has estat separate fraud monitoring & reporting unit for on-going monitoring of staff activities while an independent of indicates and procedures consistent with applicable ABC programme?  30 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  31 Does the Entity have and easignated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?  32 Does the Entity have adequate staff with appropriate levels of experience/expertise responsible for receiving of anything of value, directly or indirectly, if improperly intended to Influence action or obtain an advantage  35 Does the Entity have a global ABC policy that includes enhanced requirements regarding interaction with public officials?  36 Includes enhanced requirements regarding interaction with public officials?  37 Includes enhanced requirements regarding interaction of books  38 Includes enhanced requirements regarding interaction of books  39 Includes an enhanced requirements regarding interaction of books  30 Includes enhanced requirements regarding interaction of books  30 Includes enhanced requirements regarding interaction of books  30 Includes enhanced requirements regarding interaction of books		n the status of the AML, CTF, & Sanctions Yes, Board on quarterly basis while Senior Management on monthly basis.	25 re
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other policy applicable to the Legal Entity)?	7	Is (this may be within the ABC policy or any yapplicable to the Legal Entity)?	35 c a
Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Yes		ess of their ABC programme?	36 e
Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Yes	<u> </u>		
Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  Yes			
38 a If N, provide the date when the last ABC EWRA was completed.			3X 9 I

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49 d Prohibit decounts/relationships with shell banks to shell ban			Yes
to shell banks  49 f	49 d P	Prohibit accounts/relationships with shell banks	Yes
49 f Prohibit opening and keeping of accounts for Section 311 yes designated entitles prohibit opening and keeping of accounts for any of unicensed/unrequitated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  49 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  49 l Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  49 l Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk exists and applies across the entity, including foreign branches and effiliates  49 k Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and effiliates  49 m Outline the process and controls to identify and handle customers that were previously exited for financial crime reasons if they scele to re-establish a retationship of the processes regarding screening for sanctions, PEPs and Adverse Medal/Nepality News  49 m Outline the processes for the maintenance of internal valchilists*  50 similar document which defines a risk boundary around their business?  51 Does the Entity have record retention procedures that comply with applicable laws?  52 a fill N, clarify which questions the difference/s relate to and the branches that this applies to the product of the branches that this applies to the answers in this section are representative of all the LEPs branches  52 a fill N, clarify which questions the difference/s relate to and the branches that this applies to the answers in this section to the answers in this section.  53 a fill appropriate, provide any additional information/context to the answers in this section.  54 a Client Des the Entity's AML & CTF EWRA cover the inherent risk components detailed below.  55 a Constitution of the product			Yes
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49 m Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News  Outline the processes for the maintenance of internal "watchlists"  Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?  50 Does the Entity have record retention procedures that comply with applicable laws?  51 a If Y, what is the retention period? Minimum 10 years as per regulatory guidelines.  52 Confirm that all responses provided in the above Section are representative of all the LE's branches  53 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  63 If appropriate, provide any additional information/context to the answers in this section.  6. AMIL, CTF & SANCTIONS RISK ASSESSMENT  54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  54 Client Yes  55 Channel Yes  56 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  56 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  57 Channel	491 c	customers that were previously exited for financial crime	Yes
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54 c Channel Yes 54 d Geography Yes  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:			<del></del>
55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:			Yes
effectiveness components detailed below:	54 d (	Geography	Yes
	55 0	Does the Entity's AML & CTF EWRA cover the controls	
55 a Transaction Monitoring Yes	55 a 📑	Transaction Monitoring	Yes
55 b Customer Due Diligence Yes			
55 c PEP Identification Yes			
55 d Transaction Screening Yes	55 d	Transaction Screening	Yes
55 e Name Screening against Adverse Media/Negative News Yes			
55 f Training and Education Yes	$\longrightarrow$		
55 g Governance Yes	55 g(0	Governance	

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6 a la visa complete.  7 a Client Front Selection Select		the last 12 months?	
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And the components of calculated below.  7		was completed.	
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88 of Management information   Yes   88			Yes
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7, KYC, CDD and EDD  62 Does the Entity verify the identity of the customer?  82 Does the Entity verify the identity of the customer?  83 CDD must be completed, e.g. at the first of onboarding or within 30 days?  84 Within of the following does the Entity gather and retain when conducting CDD? Select all that apply:  85 A Within of the following does the Entity gather and retain when conducting CDD? Select all that apply:  86 A Selected activity  86 A Selected activity  86 A Selected activity  86 A Selected activity  87 A Selected activity  88 A Selected activity  89 A Selected activity  89 A Selected activity  80 A Selected activity  81 A Selected activity  82 A Selected activity  83 A Selected activity  84 A Selected activity  85 A Selected activity  85 A Selected activity  86 A Selected activity  86 A Selected activity  86 A Selected activity  87 A Selected activity  88 A Selected activity  89 A Selected activity  89 A Selected activity  80 A Selected activity  81 A Selected activity  82 A Selected activity  83 A Selected activity  84 A Selected activity  85 A Selected activity  86 A Selected activity  86 A Selected activity  86 A Selected activity  87 A Selected activity  88 A Selected activity  89 A Selected activity  89 A Selected activity  80 A Select	J 61		Nti
Section   Sect	7 KYC CD		•
Die Betrity's policies and procedures set out when			Vos
CDD must be completed, e.g., at the time of onboarding or within 30 days?  A which of the following does the Entity gather and retain when conducting CDD? Select all that apply.  A customer identification Yes  A custo	- 62		res
or within 30 days?  64 when conducting CDD? Select all that apply:  64 b Expected activity Yes  64 b Expected activity Yes  64 c Nature of business/employment Yes  64 d Ownership structure Yes  64 d Ownership structure Yes  64 f Purpose and nature of relationship Yes  64 f Purpose and nature of relationship Yes  64 f Purpose and nature of relationship Yes  64 g Source of funds Yes  65 d Source of tunds Yes  65 a Ultimate beneficial owners writed?  65 a Ultimate beneficial owners writed?  65 a Ultimate beneficial owners writed?  65 b Authorised signations (where applicable) Yes  65 c Key controllers  65 d Other relevant parties  66 d Ober felevant parties  67 Does the due diligence process result in customers receiving a risk disselfication?  67 Does the due diligence process result in customers receiving a risk disselfication?  67 a Conduct Usage Yes  68 a If Y, is this at Yes  68 a If Y, is this at Trigger event Yes  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  68 a If Y, is this at Trigger event  69 and Conduct Usage Trigge	۲,		Vas
Which of the following does the Entity gather and retain when conducting CDDS select all that apply:	0.5		163
When conducting CDD? Select all that apply:   Yes			
Set a   Customer identification   Yes	64		-
64 b   Expected activity   Yes	<b>—</b>		V
64 c   Nature of business/employment   Yes			
64   Ownership structure			
Set   Product Usage   Yes			
64 f Purpose and nature of relationship Yes 64 g Source of funds Yes 64 h Source of wealth Yes 65 Are each of the following identified; 65 a Ultimate beneficial ownership Yes 65 a Are ultimate beneficial owners verified? Yes 65 b Are untimate beneficial owners verified? Yes 65 c Key controllers Yes 65 c Key controllers Yes 66 d Ultimate beneficial ownership identification?  66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?  67 Does the due diligence process result in customers receiving a risk classification?  67 Does the due diligence process result in customers receiving a risk classification?  67 a Sustrained of the full of the fu	_		
64 gl Source of funds Yes 65 4 Nover of wealth Yes 65 Are each of the following identified: 65 a Ultimate beneficial ownership of the following identified: 65 a Ultimate beneficial ownership of Yes 65 b Authorized signatories (where applicable) Yes 65 b Authorized signatories (where applicable) Yes 65 c (Key controllers Yes) 65 d Other relevant parties Yes 66 d Other relevant parties Yes 67 d Other (specify a minimum (lowest) threshold applied beneficial ownership identification? 68 d Other relevant parties Yes 69 d What is the Entity's minimum (lowest) threshold applied beneficial ownership identification? 69 d Vinaties the Entity's minimum (lowest) threshold applied beneficial ownership identification? 60 d Vinaties the Entity's minimum (lowest) threshold applied on a control of the contr			
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69 a If Y, is this at: - 69 a1 Onboarding Yes	69	1	I CO
69 a1 Onboarding Yes	<u> </u>		
			<u> </u>
69 a2  KYC renewal  Yes			
	69 a2	KYC renewal	Yes

		N.
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Automated
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a2	Trigger event	Yes
72		Automated
		, i
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	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	KYC is an on-going process wherein the customer profile is monitored automatically for any change in profile behavior. KYC information is reviewed and updated whenever any change is observed in customer profile including but not limited to source of income, geography, services, residential status, transaction volume etc. or any other change in profile of the customer that merits revision. Further, the periodic review frequency for High-Risk, Medium Risk & Low Risk customers is 01 Year, 03 Years & 05 Years respectively.
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	EDD on risk-based approach
76 b	Respondent Banks	Always subject to EDD
<del></del>	If EDD or restricted, does the EDD assessment contain	, , , , , , , , , , , , , , , , , , , ,
76 b1	the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes ,,
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
761	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organizations	Always subject to EDD ,
76 k	Non-resident customers	EDD on risk-based approach
76	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
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	Prohibited
76 y	Other (specify)	Individuals / entities subject to OFAC / UNSC / sanctions and/or local proscribed individuals / entities involved in predicate crimes are prohibited as per Bank's Policy.  ABL deals with regulated MVTS/ MSB only for inward home remittance transactions under State Bank of Pakistan, Ministry of Overseas Pakistanis and Ministry of Finance joint initiative - Pakistan Remittance Initiative (PRI). Further ABL does not enter into or continue a correspondent banking relationship with a bank incorporated in a jurisdiction, in which it (the correspondent bank) has no physical presence.  ABL only entertains licensed arms, ammunition dealers. Defense, military, atomic power related accounts are opened on production of a special resolution by respective Ministry / Finance Division of the respective
		department, along with satisfactory performance of EDD measures.
77	If restricted, provide details of the restriction	Not Applicable
78	Does EDD require senior business management and/or	Yes ,
	compliance approval?	I .

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78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and	Not Applicable
82	the branch/es that this applies to  If appropriate, provide any additional information/context to the answers in this section.	ABL doesn't provide services or transact with Shell Bank, Unregulated Charities, Red Light Business / Adult Entertainment, Virtual Currencies, Marijuana, Gambling, Hawala / Hundi / Other Illegal MVTS, Proscribed / Designated Entities / Industries such as listed under UNSC, OFAC, EU or any business activity prohibited/restricted by the Govt. of Pakistan or any regulatory authority in Pakistan.
8. MONITO	RING & REPORTING	profibited by the cover of animal or any regulatory admining the parameter
83	Does the Entity have risk based policies, procedures and	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Not Applicable
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Financial Crime and Compliance Management (FCCM)
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction recording requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	Yes
89	timely manner? Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a	Yes
90	timely manner?  Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not Applicable
91	If appropriate, provide any additional information/context to the answers in this section.	Nii
9. PAYMEN	IT TO AMED A DENOV	,
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
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	Yes
93 b	Local Regulations	Yes
93 b1 93 c	If Y, specify the regulation	AML/CFT/CPF Regulations for State Bank of Pakistan's Regulated Entities (SBP-REs) and AML Act, 2010.  Not Applicable
330	Does the Entity have controls to support the inclusion of	Train this control of the control of
94	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.	Not Applicable
97	If appropriate, provide any additional information/context to the answers in this section.	Nii
L	,	

0. SANCT	ions	
-	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law	
98	applicable to the Entity, including with respect to its	Yes ,
	business conducted with, or through accounts held at	
	foreign financial institutions?	
	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	
99	the other entity to violate sanctions prohibitions	Yes
	applicable to the other entity (including prohibitions within	
	the other entity's local jurisdiction)?	
	Does the Entity have policies, procedures or other	
	controls reasonably designed to prohibit and/or detect	,
	actions taken to evade applicable sanctions prohibitions,	
100	such as stripping, or the resubmission and/or masking, of	Yes
	sanctions relevant information in cross border	
	transactions?	
	Does the Entity screen its customers, including beneficial	
	ownership information collected by the Entity, during	L.
101	onboarding and regularly thereafter against Sanctions	Yes
	Lists?	
400	What is the method used by the Entity for sanctions	,
102	screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	•
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
	If a 'vendor-sourced tool' or 'both' selected, what is the	
102 a1a	name of the vendor/tool?	LexisNexis Risk Solutions - Firco Compliance Link
	When did you last test the effectiveness (of finding true	
	matches) and completeness (lack of missing data) of the	
102 a2	matching configuration of the automated tool? (If 'Other'	< 1 year
	please explain in Question 110)	,
	Does the Entity screen all sanctions relevant data,	-
	including at a minimum, entity and location information,	L.
103	contained in cross border transactions against Sanctions	Yes
	Lists?	
104	What is the method used by the Entity?	Automated
	Does the Entity have a data quality management	
105	programme to ensure that complete data for all	Yes
100	transactions are subject to sanctions screening?	
	Select the Sanctions Lists used by the Entity in its	
106	sanctions screening processes:	<u>'</u>
	Consolidated United Nations Security Council Sanctions	
106 a	List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
	United States Department of the Treasury's Office of	
106 b	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
	Office of Financial Sanctions Implementation HMT	
106 c	(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
	2.5.5 mentioning by out of or morning sections	Adverse Media Reporting List, Iran Identification and Monitoring Enhancements List, Section 311 List of US
400-	L	Patriot Act List, Bank of England (BofE), Her Majesty's Treasury (HMT), Japanese Sanction Lists i.e., Ministry of
106 f	Other (specify)	Finance (MOF) & Ministry of Economy Trade & Industry (METI), and Local Lists i.e., National Counter Terrorism
		Authority (NACTA), FIA Red/black books etc.
	When regulatory authorities make updates to their	
4.5-	Sanctions list, how many business days before the entity	
107	updates their active manual and/or automated screening	<u> -</u>
	systems against:	
		As & when there is an update within any subscribed lists, the same gets updated automatically on real time
107 a	Customer Data	basis
***		As & when there is an update within any subscribed lists, the same gets updated automatically on real time
107 b	Transactions	basis.
	Does the Entity have a physical presence, e.g. branches,	<u> </u>
	subsidiaries, or representative offices located in	
108	countries/regions against which UN, OFAC, OFSI, EU or	Ino
100	G7 member countries have enacted comprehensive	
	liurisdiction_based Sanctions?	
	jurisdiction-based Sanctions?  Confirm that all responses provided in the above Section	i.
109	Confirm that all responses provided in the above Section	Yes ,
	Confirm that all responses provided in the above Section are representative of all the LE's branches	<u> </u>
109 109 a	Confirm that all responses provided in the above Section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and	Yes ,
	Confirm that all responses provided in the above Section are representative of all the LE's branches	<u> </u>

44 TO A (\$115)	1. TRAINING & EDUCATION		
11. IRAININ			
111	Does the Entity provide mandatory training, which includes:	<u> </u>	
111 a	Identification and reporting of transactions to government authorities	Yes	
111 b	The state of the s	Yes	
111 c	of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	
111 e	Conduct and Culture	Yes	
111 f	Fraud	Yes	
112	Is the above mandatory training provided to :	- , , , , , , , , , , , , , , , , , , ,	
112 a	Board and Senior Committee Management	Yes	
112 b	1st Line of Defence	Yes	
112 c	2nd Line of Defence	Yes	
112 d		Yes	
112 e	Third and in the house and it a COC activities have been	Not Applicable	
112 f	Non-employed workers (contractors/consultants)	Not Applicable	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes	
114	Does the Entity provide customized training for AML,	Yes	
114 a	If Y, how frequently is training delivered?	Annually	
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable	
116	If appropriate, provide any additional information/context to the answers in this section.	Mandatory trainings including AML/CFT/CPF & Fraud awareness etc. are provided to the Bank wide respective staff internally & externally on regular basis. These mandatory trainings are observed by Human Recourse Group of the Bank and conducted at least once a year, with additional trainings as necessary.	
12. QUALIT	Y ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes ,	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable	
120	If appropriate, provide any additional information/context to the answers in this section.	Nil	

13. AUDIT		
J. AUDIT	In addition to inspections by the government	· · · · · · · · · · · · · · · · · · ·
121	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	-
122 a	Internal Audit Department	Yearly
122 b	External Third Party	KPMG Taseer Hadi & Co. Chartered Accountants.  Further, the Regulator i.e., State Bank of Pakistan conducts AML/CFT/CPF & Sanctions program audit on annual basis or as & when deemed necessary by the Regulator.
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 <u>f</u>	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 [	Other (specify)	-
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
126	If appropriate, provide any additional information/context to the answers in this section.	Nil ,
14. FRAU	0	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
129	Does the Entity have real time monitoring to detect fraud?	Yes
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?	,
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
132	If appropriate, provide any additional information/context to the answers in this section.	Nil

## **Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2025 (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)

Allied Bank Limited 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.

Allied Bank Limited 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.

Allied Bank Limited recognizes the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

Allied Bank Limited 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.

Allied Bank Limited commits to file accurate supplemental information on a timely basis.

I. Qazi Muhammad Zeeshan Ali, certify that I have read and understood this declaration, that the enswers provided In this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am uthorized to execute this declaration on behalf of Allied Bank Limited.

I, Saijad Sheikh, 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 authorized to execute this declaration on behalf of Allied Bank Limited.

(Signature & Da

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