## the Wolfsberg Group

Financial Institution Name: Location (Country) :

Kumari	Bank	Limite
Nenal		

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	13075
1. ENTIT	Y & OWNERSHIP		
1	Full Legal Name	KUMARI BANK LIMITED	
2	Append a list of foreign branches which are covered by this questionnaire	NOT APPLICABLE	
3	Full Legal (Registered) Address	KATHMANDU METROPOLITANCITY, WARD NO. 2, TANGAL, KATHMANDU, NEPAL	
4	Full Primary Business Address (if different from above)	NA NA	
5	Date of Entity incorporation/establishment	10 December 1999	
6	Select type of ownership and append an ownership chart if available		
6 a	Publicly Traded (25% of shares publicly traded)	Yes	
6 a1	If Y, indicate the exchange traded on and ticker symbol	Nepal Stock Excahnge   (KBL)	
6 b	Member Owned/Mutual	No No	7
6 c	Government or State Owned by 25% or more	No	N.
6 d	Privately Owned	No	版連
6 d1	If Y, provide details of shareholders or ultimate "beneficial owners with a holding of 10% or more	NA	
7	% of the Entity's total shares composed of bearer shares	NA	100
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No	-
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	NA	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No	<b>-</b>
10	Name of primary financial regulator/supervisory authority	Nepal Rastra Bank	119 87
11	Provide Legal Entity Identifier (LEI) if available	254900LT6XJDNQSUIS05	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Not Applicable	173.45







13	Jurisdiction of licensing authority and regulator of ultimate parent	Not Applicable
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	
14 c	Commercial Banking	Landard Control of the Control of th
14 d	Control of the Contro	Yes
	Transactional Banking	Yes
14 e	Investment Banking	No.
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No.
14 h	Broker/Dealer	No State of the st
14 i	Multilateral Development Bank	No X
14 j	Wealth Management	No 🗀
14 k	Other (please explain)	Remittance Services, Trade Finance
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.	Not Applicable
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
18	If appropriate, provide any additional information/context to the answers in this section.	NA NA
2. PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	IfY	ETT CONTRACTOR SERVICES IN CONTRACTOR SERVICES
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to	
	provide downstream relationships?	No 🔻
19 a1c		Yes Yes
19 a1c	provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with	
	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	Yes
19 a1d	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	Yes Yes
19 a1d	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	Yes Yes V
19 a1d 19 a1e 19 a1f	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	Yes  Yes  Ves  Ves
19 a1d  19 a1e  19 a1f  19 a1g	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)?	Yes  Yes  Ves  Yes  Yes
19 a1d 19 a1e 19 a1f 19 a1g	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	Yes  Yes  Ves  Ves







19 a1i	Does the Entity have processes and procedures 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	No
19 e	Hold Mail	No .
19 f	International Cash Letter	No
19 g	Low Price Securities	No E
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?	Yes
19 i1	If Y, please select all that apply below?	PICTURE TO THE RESIDENCE OF THE PERSON OF TH
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No E
19 i4	eCommerce Platforms	Yes
19 15	Other - Please explain	NA .
19 j	Private Banking	No E
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No E
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No E
19 p	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	Yes
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Identification and verification  Yes  Due diligence  Yes  Due diligence  Yes  Yes
19 p2a	If yes, state the applicable level of due diligence	Due diligence
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due diligence
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.	NA .
19 q	Other high-risk products and services identified by	NA .
	the Entity (please specify)	
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.	NA .
21	If appropriate, provide any additional information/context to the answers in this section.	NA .
3. AML, C	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	
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 ii	Policies and Procedures	Yes
	PEP Screening	Vac
22 j 22 k		Yes
e e B	Risk Assessment	Yes
221	Sanctions	Yes

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22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	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	NA .
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.	NA NA
4. ANT	T BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and	Yes
31	report bribery and corruption?  Does the Entity have an enterprise wide programme	Yes
	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:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	The state of the s
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
35 с	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?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	Completed (during Annual Risk Assessment Program)
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
10	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
10 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes







40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities	Yes	
	or public officials	165	
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	10
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	
42	Does the Entity provide mandatory ABC training to:		1000000
42 a	Board and senior Committee Management	Yes	
42 b	1st Line of Defence	Yes	=
42 c	2nd Line of Defence	Yes	
42 d	3rd Line of Defence	Yes	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	<b>-</b>
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	-
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	v
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA NA	
45	If appropriate, provide any additional information/context to the answers in this section.	NA NA	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		7
46 a	doteot and report.		
46 b	13000000000000000000000000000000000000	Yes	
	Money laundering Terrorist financing	Yes Yes	
46 c	Money laundering		
271700000	Money laundering Terrorist financing	Yes	
46 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes	
46 c 47	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes	
46 c 47 48	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes	
46 c 47 48	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes Yes	
46 c 47 48 48 a 48 a1	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a1 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes Yes Yes Yes Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes	
48 a 48 a 48 a 48 a 48 b 48 b 48 b 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes	
46 c 47 48 48 a 48 a 48 a 1 48 b 1 49 a 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
46 c 47 48 48 a 48 a 1 48 b 1 49 b 49 c 49 d	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes         Yes	
46 c 47 48 48 a 48 a 48 a 48 b 49 b 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Yes	









49 j 49 k	issues/potentially suspicious activity identified by employees  Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk  Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes Yes
49 k	terminating existing customer relationships due to financial crime risk  Define the process for exiting clients for financial crime reasons that applies across the entity,	
	crime reasons that applies across the entity,	Yes
191		
	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
19 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
19 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?	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.	NA .
53	If appropriate, provide any additional information/context to the answers in this section.	NA NA
6. AML, CT	FF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes L
54 c	Channel	IMEE:
54 d 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	Yas
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes Yes C
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	NA CONTRACTOR OF THE CONTRACTO
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes L
57 b	Product	
E7 -	Channel	Yes
57 c	Geography	Yes
57 d		
57 d 58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
57 d 58 58 a	effectiveness components detailed below:  Customer Due Diligence	Yes
57 d 58	effectiveness components detailed below:	Yes I Yes I Yes I Yes

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58 e		Yes	
8 f	111411	Yes	
8 g	III LONG PARTIES OF THE PROPERTY OF THE PROPER	Yes	
9	the last 12 months?	Yes	
i9 a	If N, provide the date when the last Sanctions EWRA was completed.	NA .	
0	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 is relate to and the branch/es that this applies to.	NA	
51	If appropriate, provide any additional information/context to the answers in this section.	NA	
7. KYC, C	CDD and EDD		
62	Does the Entity verify the identity of the customer?	Yes	
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	-
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	
64 b	Expected activity	Yes	\ \tag{\tau}
64 c	Nature of business/employment	Yes Yes	[¥
64 d	Ownership structure	Yes	
64 e 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:		TOTAL TOTAL
65 a	Ultimate beneficial ownership	Yes	
65 a1	Are ultimate beneficial owners verified?	Yes	N.
65 b	Authorised signatories (where applicable)	Yes	-
65 c	Key controllers	Yes	
65 d	Other relevant parties	Yes	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Other (specify the percentage) 15%	•
67	Does the due diligence process result in customers receiving a risk classification?	Yes	~
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1	Product Usage	Yes	
67 a2	Geography	Yes	L
67 a3	Business Type/Industry	Yes	
67 a4	Legal Entity type	Yes	T.
67 a5 67 a6	Adverse Information Other (specify)	Yes	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	
68 a	If Y, is this at:		
68 a1	Onboarding	Yes	
68 a2	KYC renewal	Yes	
68 a3	Trigger event	Yes	
68 a4	Other / Fort - 1	Yes	
68 a4a	If yes, please specify "Other"	Obtaining Utility bills or any documentary proof of residence	
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	Onboarding	Yes	
69 a2	KYC renewal	Yes	







9 a3	Trigger event	Yes	
0	What is the method used by the Entity to screen for Adverse Media/Negative News?	Automated	~
1	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	-
1 a	If Y, is this at:		The First
1 a1	Onboarding	Yes	
1 a2	KYC renewal	Yes	
1 a2	Trigger event	Yes	
100000000000000000000000000000000000000	What is the method used by the Entity to screen PEPs?	Automated	
2		Additional	500
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:		
'4 a1	Less than one year	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	No	
74 a4	5 years or more	No	
74 a5	Trigger-based or perpetual monitoring reviews	Yes	Y
74 a6	Other (Please specify)	NA	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	<b>\</b>
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	Prohibited	N. A.
76 b	Respondent Banks	Always subject to EDD	E-78
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	EDD on risk-based approach	
	Extractive industries	Do not have this category of customer or industry	
76 d		Prohibited	N.A
76 e	Gambling customers		1
76 f	General Trading Companies	EDD on risk-based approach	₩.
76 g	Marijuana-related Entities	Prohibited	Lance
76 h	MSB/MVTS customers	EDD on risk-based approach	
761	Non-account customers	EDD on risk-based approach	~
	Non-Government Organisations	Always subject to EDD	N.
76 ]		EDD on risk-based approach	T.
76 k	Non-resident customers	Do not have this category of customer or industry	11 111
761	Nuclear power		
76 m	Payment Service Providers	EDD on risk-based approach	
76 n	PEPs	Always subject to EDD	
76 o	PEP Close Associates	Always subject to EDD	
	PEP Related	Always subject to EDD	N. T.
76 p		Always subject to EDD	N.
76 q	Precious metals and stones		
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	Always subject to EDD	N
76 v	Unregulated charities	Prohibited	
	Used Car Dealers	EDD on risk-based approach	liv.
76 w		Prohibited	
76 x	Virtual Asset Service Providers Other (specify)	NA NA	
77	If restricted, provide details of the restriction	NA NA	
78	Does EDD require senior business management and	Yes	Į.

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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 the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	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	NA THE RESERVE THE
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?	Digital Age Nepal (AML Solution Software)
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 reporting 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 timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFis) to their customers in a timely manner?	Yes
90	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	NA .
91	If appropriate, provide any additional information/context to the answers in this section.	NA .
PAVMI	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes







3	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
3 a	FATF Recommendation 16	Yes	-
3 b	Local Regulations	Yes	N. A
3 b1	If Y, specify the regulation	Assets Laundering Prevention Act, Asset Laundering Prevention Rule, Banking and Financial Institution Act, Various Directives issued by the regulators	
3 c	If N, explain		
4	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes	•
5	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes	~
5 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.	NA	
97	If appropriate, provide any additional information/context to the answers in this section.	NA	
10. SANO	TIONS		
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?	Automated	•
102 a	If 'automated' or 'both automated and manual' selected:		
102 a1 102 a1a	Are internal system of vendor-sourced tools used?  If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Vendor-sourced tools Digital Age Nepal (AML Solution Software) including data from SWIFT Sanction Screening, and TFS provided by regulator.	Accuit
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?	Automated	



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105	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 sanctions screening processes:		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	-
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	-
106 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)	NA .	
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	V
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA .	
110	If appropriate, provide any additional information/context to the answers in this section.	NA NA	
11. TRAIN	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	Yes	-
111 c	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	3rd Line of Defence	Yes	
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	-
112 f	Non-employed workers (contractors/consultants)	Yes	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	100-100	-
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	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	NA NA
	and the branch/es that this applies to.	
16	If appropriate, provide any additional	NA NA
	information/context to the answers in this section.	
The state of the s	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)?	No No
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	No
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.	NA .
120	If appropriate, provide any additional information/context to the answers in this section.	NA NA
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	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	Yearly
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 123 e	KYC/CDD/EDD and underlying methodologies     Name Screening & List Management	Yes Yes
123 e 123 f	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 123 l	Training & Education Other (specify)	Yes NA
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.	NA
126	If appropriate, provide any additional information/context to the answers in this section.	NA
14. FRAU	UD.	
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



	Does the Entity have real time monitoring to detect fraud?	Yes
30	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
31	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
31 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	NA
32	If appropriate, provide any additional information/context to the answers in this section.	NA .
Declarat	tion Statement	
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every effor	rt to remain in full compliance with all applicable financial crime la- cial institution understands the critical importance of having effec- equiatory obligations.	ws, regulations and standards in all of the jurisdictions in which it does business and ribbs decentarions, the and sustainable controls to combat financial crime in order to protect its reputation and to meet its
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