



Financial Institution Name: Laxmi Sunrise Bank Limited
 Location (Country): Nepal

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
1. ENTITY & OWNERSHIP		
1	Full Legal Name	LAXMI SUNRISE BANK LIMITED
2	Append a list of foreign branches which are covered by this questionnaire	We do not have branches outside our jurisdiction.
3	Full Legal (Registered) Address	Laxmi Complex, Hattisar Ward No.1, Kathmandu, Nepal
4	Full Primary Business Address (if different from above)	Same as Above
5	Date of Entity incorporation/establishment	27 September 2001
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes <input checked="" type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	Nepal Stock Exchange Ticker Symbol : LSL
6 b	Member Owned/Mutual	No <input checked="" type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input checked="" type="checkbox"/>
6 d	Privately Owned	No <input checked="" type="checkbox"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
7	% of the Entity's total shares composed of bearer shares	No
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No <input checked="" type="checkbox"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No <input checked="" type="checkbox"/>
10	Name of primary financial regulator/supervisory authority	Nepal Rastra Bank (Central Bank of Nepal)
11	Provide Legal Entity Identifier (LEI) if available	254900NAZH4DXOL12Y19
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A



13	Jurisdiction of licensing authority and regulator of ultimate parent	N/A	
14	Select the business areas applicable to the Entity		
14 a	Retail Banking	Yes	<input type="checkbox"/>
14 b	Private Banking	No	<input type="checkbox"/>
14 c	Commercial Banking	Yes	<input type="checkbox"/>
14 d	Transactional Banking	Yes	<input type="checkbox"/>
14 e	Investment Banking	No	<input type="checkbox"/>
14 f	Financial Markets Trading	Yes	<input type="checkbox"/>
14 g	Securities Services/Custody	No	<input type="checkbox"/>
14 h	Broker/Dealer	No	<input type="checkbox"/>
14 i	Multilateral Development Bank	No	<input type="checkbox"/>
14 j	Wealth Management	No	<input type="checkbox"/>
14 k	Other (please explain)	N/A	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No	<input type="checkbox"/>
15 a	If Y, provide the top five countries where the non-resident customers are located.		
16	Select the closest value:		
16 a	Number of employees	1001-5000	<input type="checkbox"/>
16 b	Total Assets	Greater than \$500 million	<input type="checkbox"/>
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes	<input type="checkbox"/>
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
18	If appropriate, provide any additional information/context to the answers in this section.		
2. PRODUCTS & SERVICES			
19	Does the Entity offer the following products and services:		
19 a	Correspondent Banking	No	<input type="checkbox"/>
19 a1	If Y		
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No	<input type="checkbox"/>
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No	<input type="checkbox"/>
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No	<input type="checkbox"/>
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	No	<input type="checkbox"/>
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No	<input type="checkbox"/>
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No	<input type="checkbox"/>
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	No	<input type="checkbox"/>
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?		
19 a1h1	MSBs	No	<input type="checkbox"/>
19 a1h2	MVTs	No	<input type="checkbox"/>
19 a1h3	PSPs	No	<input type="checkbox"/>

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	No	<input type="checkbox"/>
19 b	Cross-Border Bulk Cash Delivery	No	<input type="checkbox"/>
19 c	Cross-Border Remittances	Yes	<input type="checkbox"/>
19 d	Domestic Bulk Cash Delivery	No	<input type="checkbox"/>
19 e	Hold Mail	No	<input type="checkbox"/>
19 f	International Cash Letter	No	<input type="checkbox"/>
19 g	Low Price Securities	No	<input type="checkbox"/>
19 h	Payable Through Accounts	No	<input type="checkbox"/>
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No	<input type="checkbox"/>
19 i1	If Y, please select all that apply below?		
19 i2	Third Party Payment Service Providers	No	<input type="checkbox"/>
19 i3	Virtual Asset Service Providers (VASPs)	No	<input type="checkbox"/>
19 i4	eCommerce Platforms	No	<input type="checkbox"/>
19 i5	Other - Please explain		
19 j	Private Banking	No	<input type="checkbox"/>
19 k	Remote Deposit Capture (RDC)	No	<input type="checkbox"/>
19 l	Sponsoring Private ATMs	No	<input type="checkbox"/>
19 m	Stored Value Instruments	No	<input type="checkbox"/>
19 n	Trade Finance	Yes	<input type="checkbox"/>
19 o	Virtual Assets	No	<input type="checkbox"/>
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	No	<input type="checkbox"/>
19 p1a	If yes, state the applicable level of due diligence	Please select	
19 p2	Wire transfers	Yes	<input type="checkbox"/>
19 p2a	If yes, state the applicable level of due diligence	Due diligence	<input type="checkbox"/>
19 p3	Foreign currency conversion	Yes	<input type="checkbox"/>
19 p3a	If yes, state the applicable level of due diligence	Due diligence	<input type="checkbox"/>
19 p4	Sale of Monetary Instruments	No	<input type="checkbox"/>
19 p4a	If yes, state the applicable level of due diligence	Due diligence	<input type="checkbox"/>
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Bank has been providing services to Walk in customer for purpose of payment of remittance received and foreign exchange purposes. Simplified KYC due diligence performed as per regulatory guidelines and banks policies and procedures.	
19 q	Other high-risk products and services identified by the Entity (please specify)	No other high risk products identified by the entity,	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes	<input type="checkbox"/>
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
21	If appropriate, provide any additional information/context to the answers in this section.		
3. AML, 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	Yes	<input type="checkbox"/>
22 b	Adverse Information Screening	Yes	<input type="checkbox"/>
22 c	Beneficial Ownership	Yes	<input type="checkbox"/>
22 d	Cash Reporting	Yes	<input type="checkbox"/>
22 e	CDD	Yes	<input type="checkbox"/>
22 f	EDD	Yes	<input type="checkbox"/>
22 g	Independent Testing	Yes	<input type="checkbox"/>
22 h	Periodic Review	Yes	<input type="checkbox"/>
22 i	Policies and Procedures	Yes	<input type="checkbox"/>
22 j	PEP Screening	Yes	<input type="checkbox"/>
22 k	Risk Assessment	Yes	<input type="checkbox"/>
22 l	Sanctions	Yes	<input type="checkbox"/>

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22 m	Suspicious Activity Reporting	Yes	<input type="checkbox"/>
22 n	Training and Education	Yes	<input type="checkbox"/>
22 o	Transaction Monitoring	Yes	<input type="checkbox"/>
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100	<input type="checkbox"/>
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	<input type="checkbox"/>
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	<input type="checkbox"/>
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	<input type="checkbox"/>
26 a	If Y, provide further details		
27	Does the entity have a whistleblower policy?	Yes	<input type="checkbox"/>
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI BRIBERY & CORRUPTION			
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	<input type="checkbox"/>
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	<input type="checkbox"/>
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	<input type="checkbox"/>
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	<input type="checkbox"/>
34	Is the Entity's ABC programme applicable to:	Not Applicable	<input type="checkbox"/>
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	<input type="checkbox"/>
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	<input type="checkbox"/>
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	<input type="checkbox"/>
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	<input type="checkbox"/>
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	<input type="checkbox"/>
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	<input type="checkbox"/>
38 a	If N, provide the date when the last ABC EWRA was completed.	15th July 2024 Bank has separate ABC policy and program. Besides provisions related to ABC has been incorporated as a part of code of conduct. Declaration on compliance of code of conduct has been duly obtained from all stakeholders.	
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	<input type="checkbox"/>
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	<input type="checkbox"/>
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	No	<input type="checkbox"/>



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40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No	<input type="checkbox"/>
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No	<input type="checkbox"/>
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	<input type="checkbox"/>
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No	<input type="checkbox"/>
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="checkbox"/>
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	<input type="checkbox"/>
42 b	1st Line of Defence	Yes	<input type="checkbox"/>
42 c	2nd Line of Defence	Yes	<input type="checkbox"/>
42 d	3rd Line of Defence	Yes	<input type="checkbox"/>
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	<input type="checkbox"/>
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	<input type="checkbox"/>
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	<input type="checkbox"/>
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.	The issues have been covered in our ABC policy and HR Bylaws. Further, we have been conducting ABC awareness training to all the employees.	
5. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	<input type="checkbox"/>
46 b	Terrorist financing	Yes	<input type="checkbox"/>
46 c	Sanctions violations	Yes	<input type="checkbox"/>
47	Are the Entity's policies and procedures updated at least annually?	Yes	<input type="checkbox"/>
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	No	<input type="checkbox"/>
48 a1	If Y, does the Entity retain a record of the results?	Please select	<input type="checkbox"/>
48 b	EU Standards	No	<input type="checkbox"/>
48 b1	If Y, does the Entity retain a record of the results?	Please select	<input type="checkbox"/>
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="checkbox"/>
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<input type="checkbox"/>
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="checkbox"/>
49 d	Prohibit accounts/relationships with shell banks	Yes	<input type="checkbox"/>
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	<input type="checkbox"/>
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="checkbox"/>
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	<input type="checkbox"/>
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="checkbox"/>



49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	<input type="checkbox"/>
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	<input type="checkbox"/>
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	<input type="checkbox"/>
49 l	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	<input type="checkbox"/>
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	<input type="checkbox"/>
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	<input type="checkbox"/>
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="checkbox"/>
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	<input type="checkbox"/>
51 a	If Y, what is the retention period?	5 years or more	<input type="checkbox"/>
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53	If appropriate, provide any additional information/context to the answers in this section.	Regarding Clause No.48. Nepal is a member of APG which is member of FATF. Whenever the international regulations are updated by the FATF with respect to US, UN, EU standard the same shall be applied to our bank via APG and FIU Nepal. These changes are instructed to all BF's via Unified Directive	
6. AML, CTF & SANCTIONS RISK ASSESSMENT			
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	<input type="checkbox"/>
54 b	Product	Yes	<input type="checkbox"/>
54 c	Channel	Yes	<input type="checkbox"/>
54 d	Geography	Yes	<input type="checkbox"/>
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	<input type="checkbox"/>
55 b	Customer Due Diligence	Yes	<input type="checkbox"/>
55 c	PEP Identification	Yes	<input type="checkbox"/>
55 d	Transaction Screening	Yes	<input type="checkbox"/>
55 e	Name Screening against Adverse Media/Negative News	Yes	<input type="checkbox"/>
55 f	Training and Education	Yes	<input type="checkbox"/>
55 g	Governance	Yes	<input type="checkbox"/>
55 h	Management Information	Yes	<input type="checkbox"/>
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	<input type="checkbox"/>
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	<input type="checkbox"/>
57 b	Product	Yes	<input type="checkbox"/>
57 c	Channel	Yes	<input type="checkbox"/>
57 d	Geography	Yes	<input type="checkbox"/>
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	<input type="checkbox"/>
58 b	Governance	Yes	<input type="checkbox"/>
58 c	List Management	Yes	<input type="checkbox"/>
58 d	Management Information	Yes	<input type="checkbox"/>

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58 e	Name Screening	Yes	<input checked="" type="checkbox"/>
58 f	Transaction Screening	Yes	<input checked="" type="checkbox"/>
58 g	Training and Education	Yes	<input checked="" type="checkbox"/>
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	<input checked="" type="checkbox"/>
59 a	If N, provide the date when the last Sanctions EWRA was completed.		
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input checked="" type="checkbox"/>
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
61	If appropriate, provide any additional information/context to the answers in this section.		
7. KYC, CDD and EDD			
62	Does the Entity verify the identity of the customer?	Yes	<input checked="" type="checkbox"/>
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	<input checked="" type="checkbox"/>
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	<input checked="" type="checkbox"/>
64 b	Expected activity	Yes	<input checked="" type="checkbox"/>
64 c	Nature of business/employment	Yes	<input checked="" type="checkbox"/>
64 d	Ownership structure	Yes	<input checked="" type="checkbox"/>
64 e	Product usage	Yes	<input checked="" type="checkbox"/>
64 f	Purpose and nature of relationship	Yes	<input checked="" type="checkbox"/>
64 g	Source of funds	Yes	<input checked="" type="checkbox"/>
64 h	Source of wealth	Yes	<input checked="" type="checkbox"/>
65	Are each of the following identified:		
65 a	Ultimate beneficial ownership	Yes	<input checked="" type="checkbox"/>
65 a1	Are ultimate beneficial owners verified?	Yes	<input checked="" type="checkbox"/>
65 b	Authorised signatories (where applicable)	Yes	<input checked="" type="checkbox"/>
65 c	Key controllers	Yes	<input checked="" type="checkbox"/>
65 d	Other relevant parties	Yes	<input checked="" type="checkbox"/>
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%	<input checked="" type="checkbox"/>
67	Does the due diligence process result in customers receiving a risk classification?	Yes	<input checked="" type="checkbox"/>
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	<input checked="" type="checkbox"/>
67 a2	Geography	Yes	<input checked="" type="checkbox"/>
67 a3	Business Type/Industry	Yes	<input checked="" type="checkbox"/>
67 a4	Legal Entity type	Yes	<input checked="" type="checkbox"/>
67 a5	Adverse Information	Yes	<input checked="" type="checkbox"/>
67 a6	Other (specify)		
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No	<input checked="" type="checkbox"/>
68 a	If Y, is this at:		
68 a1	Onboarding	No	<input checked="" type="checkbox"/>
68 a2	KYC renewal	No	<input checked="" type="checkbox"/>
68 a3	Trigger event	No	<input checked="" type="checkbox"/>
68 a4	Other	No	<input checked="" type="checkbox"/>
68 a4a	If yes, please specify "Other"		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	<input checked="" type="checkbox"/>
69 a	If Y, is this at:		
69 a1	Onboarding	Yes	<input checked="" type="checkbox"/>
69 a2	KYC renewal	Yes	<input checked="" type="checkbox"/>



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69 a3	Trigger event	Yes	<input type="checkbox"/>
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual	<input type="checkbox"/>
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	<input type="checkbox"/>
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	<input type="checkbox"/>
71 a2	KYC renewal	Yes	<input type="checkbox"/>
71 a3	Trigger event	Yes	<input type="checkbox"/>
72	What is the method used by the Entity to screen PEPs?	Automated	<input type="checkbox"/>
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	<input type="checkbox"/>
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	<input type="checkbox"/>
74 a	If yes, select all that apply:		
74 a1	Less than one year	Yes	<input type="checkbox"/>
74 a2	1 – 2 years	Please select	<input type="checkbox"/>
74 a3	3 – 4 years	Please select	<input type="checkbox"/>
74 a4	5 years or more	Yes	<input type="checkbox"/>
74 a5	Trigger-based or perpetual monitoring reviews	Please select	<input type="checkbox"/>
74 a6	Other (Please specify)	Customers graded under High Risk Customer are reviewed annually; Medium Risk Customers are reviewed once in five Years & Low Risk Customers are reviewed once in every Eight years and as and when required. Further for PEP, National Level PEPs are reviewed every quarterly, Central level PEPs are reviewed Semi annually and Local Level PEPs are reviewed annually.	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
76 b	Respondent Banks	EDD on risk-based approach	<input type="checkbox"/>
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	<input type="checkbox"/>
76 c	Embassies/Consulates	EDD on risk-based approach	<input type="checkbox"/>
76 d	Extractive industries	EDD on risk-based approach	<input type="checkbox"/>
76 e	Gambling customers	EDD on risk-based approach	<input type="checkbox"/>
76 f	General Trading Companies	EDD on risk-based approach	<input type="checkbox"/>
76 g	Marijuana-related Entities	Prohibited	<input type="checkbox"/>
76 h	MSB/MVTS customers	EDD on risk-based approach	<input type="checkbox"/>
76 i	Non-account customers	Always subject to EDD	<input type="checkbox"/>
76 j	Non-Government Organisations	EDD on risk-based approach	<input type="checkbox"/>
76 k	Non-resident customers	EDD on risk-based approach	<input type="checkbox"/>
76 l	Nuclear power	Prohibited	<input type="checkbox"/>
76 m	Payment Service Providers	EDD on risk-based approach	<input type="checkbox"/>
76 n	PEPs	EDD on risk-based approach	<input type="checkbox"/>
76 o	PEP Close Associates	EDD on risk-based approach	<input type="checkbox"/>
76 p	PEP Related	EDD on risk-based approach	<input type="checkbox"/>
76 q	Precious metals and stones	EDD on risk-based approach	<input type="checkbox"/>
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry	<input type="checkbox"/>
76 s	Regulated charities	EDD on risk-based approach	<input type="checkbox"/>
76 t	Shell banks	Prohibited	<input type="checkbox"/>
76 u	Travel and Tour Companies	EDD on risk-based approach	<input type="checkbox"/>
76 v	Unregulated charities	EDD on risk-based approach	<input type="checkbox"/>
76 w	Used Car Dealers	EDD on risk-based approach	<input type="checkbox"/>
76 x	Virtual Asset Service Providers	Prohibited	<input type="checkbox"/>
76 y	Other (specify)		
77	If restricted, provide details of the restriction	Regulators and our internal policies restricted to do business with companies that fall under above mentioned points where our response is "Prohibited". Casino are onboarded by applying EDD measures. Also income generated from gambling is considered as illegal. So customers generating income from gambling is regarded as illegal and hence is restricted from operating a bank accounts.	
78	Does EDD require senior business management and/or compliance approval?	Yes	<input type="checkbox"/>

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78 a	If Y indicate who provides the approval:	Senior business management	<input type="checkbox"/>
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes	<input type="checkbox"/>
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	<input type="checkbox"/>
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
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. MONITORING & REPORTING			
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	<input type="checkbox"/>
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	<input type="checkbox"/>
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Exception reports are generated from CBS.	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both	<input type="checkbox"/>
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Manipal Technologies	
84 b2	When was the tool last updated?	< 1 year	
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year	<input type="checkbox"/>
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	<input type="checkbox"/>
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	<input type="checkbox"/>
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	<input type="checkbox"/>
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes	<input type="checkbox"/>
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	<input type="checkbox"/>
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	<input type="checkbox"/>
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.		
9. PAYMENT TRANSPARENCY			
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	<input type="checkbox"/>

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93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
93 a	FATF Recommendation 16	Yes	<input type="checkbox"/>
93 b	Local Regulations	Yes	<input checked="" type="checkbox"/>
93 b1	If Y, specify the regulation	Unified directive Number 19 of central bank. Money Laundering prevention Policy Money Laundering Prevention Rule Money Laundering Prevention Policy of the bank	
93 c	If N, explain		
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes	<input type="checkbox"/>
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes	<input type="checkbox"/>
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes	<input type="checkbox"/>
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
97	If appropriate, provide any additional information/context to the answers in this section.		
10. SANCTIONS			
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	<input type="checkbox"/>
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	<input type="checkbox"/>
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	<input type="checkbox"/>
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	<input type="checkbox"/>
102	What is the method used by the Entity for sanctions screening?	Automated	<input type="checkbox"/>
102 a	If 'automated' or 'both automated and manual' selected:		
102 a1	Are internal system of vendor-sourced tools used?	Both	<input type="checkbox"/>
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Manipal Technologies Limited * The data provided by LexisNexus(Acuity) are uploaded into our screening system. The customers data at the time of onboarding are undergone screening against the sanction /PEP and EDD of LexisNexus(Acuity). If customers information are detected during screening, CDD is conducted and customers are onboarded with appropriate risk grading.	
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	<input type="checkbox"/>
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	<input type="checkbox"/>
104	What is the method used by the Entity?	Automated	<input type="checkbox"/>

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