



KYC Registry

Extract of the

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ)


as available on Swift KYC Registry for:

HSBC BANK (CHILE)

Office type	Head Office / Subsidiary
BIC	BLICCLRMXXX
LEI	549300818FWC2UB73V44
Location	SANTIAGO, Chile

File produced with data up to 16 Jul 2024

Extracted from Swift KYC Registry on 17 July 2024

1. Full Legal name..... HSBC BANK (CHILE)
1. Full Legal name in local language Not applicable
3. Full Legal (Registered) address
3. Building name..... Not applicable
3. Apartment / floor / office number Piso 23
3. PO Box..... Not applicable
3. Street name..... Avenida Isidora Goyenechea
3. Street/house number 2800
3. City Santiago
3. Postal / ZIP code Not applicable
3. County / Province / State / District Not applicable
3. Country..... Chile
4. Full Primary Business Address (Operating address)
4. Building name..... Not applicable
4. Apartment / floor / office number..... Piso 23
4. PO Box..... Not applicable
4. Street name Avenida Isidora Goyenechea
4. County / Province / State / District..... Not applicable
4. Country Chile
5. Date of incorporation/establishment 07 Nov 2002
4. Street/house number 2800
4. City Santiago
4. Postal / ZIP code Not applicable
6. Type of ownership  Publicly traded (Wolfsberg DDQ #6a)
Member Owned/Mutual (Wolfsberg DDQ #6b)
Government or State owned (Wolfsberg DDQ #6c)
Privately owned (Wolfsberg DDQ #6d)
Other
Other
- 6d. Optional clarification if privately owned..... Not applicable
- 6d1. Shareholding entities statement..... We confirm that the shareholding entities of the entity are as follows and that no other entity owns or controls directly and/or indirectly 10 % or more of the entity's shares
- 6d1. Shareholding entities (threshold 10% mandatory)
- 6d1. Legal name..... HSBC Inversiones S.A.
- 6d1. Legal name HSBC Latin America Holdings (UK) Limited
- 6d1. % shares diluted 99.969
- 6d1. Legal name..... HSBC Holdings PLC

6d1. % shares diluted..... 99.969

6d1. Legal name..... HSBC Latin America B.V.

6d1. % shares diluted..... 0.0299

6d1.	Legal name.....	HSBC Latin America Holdings (UK) Limited
6d1.	% shares diluted.....	0.0299
6d1.	Legal name.....	HSBC Holdings PLC
6d1.	% shares diluted.....	0.0299
6d1.	Legal name	HSBC Overseas Holding (UK) Limited
6d1.	Ultimate Beneficial Owners statement (UBO statement)	We confirm that no natural person controls or owns directly and/or indirectly 10 % or more of the entity's shares
7.	Is the entity able to issue bearer shares?	No
8.	Licence information	
8.	Does the entity, or any of its branches, operate under an offshore banking license (OBL)?	No
9.	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10.	Name of primary financial regulator/supervisory authority	Other
10.	Other.....	Comisión para el Mercado Financiero - Commission for the Financial Market
11.	Legal Entity Identifier (LEI)	549300818FWC2UB73V4
12.	Full legal name of the ultimate entity completing the DDQ	HSBC Holdings plc
13.	Jurisdiction parent.....	HSBC Group is globally supervised in UK by FCA.
14.	Select	
14a.	Retail Banking	No
14b.	Private Banking	No
14c.	Commercial Banking.....	Yes
14d.	Transactional Banking	Yes
14e.	Investment Banking	No
14f.	Financial Markets Trading	Yes
14g.	Securities Services / Custody.....	No
14h.	Broker / Dealer	No
14i.	Multilateral Development Bank.....	No
14j.	Wealth Management.....	No
14k.	Other	Corporate/Commercial Banking, Issuer Services
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 different jurisdiction to the location where bank services are provided.)	No
16a.	Number of employees.....	51-200
16b.	Total assets	Greater than \$500 million
17.	Are all answers provided to CBDDQ Questions 1-16b representative of all the legal entity's branches?	No
17a.	Clarify which questions the difference(s) relate to and the	Answers in this section apply to the HSBC entity and its

- branch(es) that this applies to domestic branches (if any). For any foreign branches please refer to their separate SWIFT KYC Registry profiles including CBDDQ.
18. Additional information/ context to CBDDQ Question 1 - 16b HSBC Chile is a single corporate branch located in Santiago (90~ employees). HBCL has 550 clients ~ and it focused on key local corporate and multinationals customers. Client Coverage teams include RMs specialized by sector and Dedicated Multinationals teams.
19. Does the Entity offer the following products and services:
- 19a. Correspondent Banking..... No
- 19b. Cross - Border Bulk Cash Delivery No
- 19c. Cross-Border Remittances No
- 19d. Domestic Bulk Cash Delivery..... No
- 19e. Hold Mail No
- 19f. I n t e r n a t i o n a l C a s h L e t t e r No
- 19g. Low Price Securities..... No
- 19h. Payable through accounts..... No
- 19i. Payment services to non-bank entities who may then offer third party payment services to their customers? No
- 19j. Private Banking No
- 19k. Remote Deposit Capture (RDC)..... No
- 19l. Sponsoring Private ATMs..... No
- 19m. Stored Value Instruments..... No
- 19n. Trade Finance No
- 19o. Virtual/ Assets..... No
- 19q. Other high risk (please specify) Not applicable
- 19a1c. Does the entity have processes and procedures in place to identify downstream relationships with domestic banks? Yes
- 19a1f. Does the entity have processes and procedures in place to identify downstream relationships with Foreign Banks? Yes
- 19a1i. Does the Entity have processes and procedures in place to identify downstream relationships with MSBs/ MVTs/ PSPs? Yes
- 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:
- 19p1. Check cashing service No
- 19p2. Wire transfers..... No
- 19p3. Foreign currency conversion..... No
- 19p4. Sale of Monetary Instruments No
- 19p5. If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence..... Not applicable
20. Are all answers provided to CBDDQ Questions 19a-19q representative of all the legal entity's branches?..... No
- 20a. Clarify which questions the difference(s) relate to and the branch(es) that this applies to Answers in this section apply to the HSBC entity and its domestic branches (if any). For any foreign branches please refer to their separate SWIFT KYC Registry profiles including CBDDQ.

- 21. Additional information/ context to CBDDQ Questions 19a - 19q Additional clarification to Question CBDDQ 19h: Exceptional approval has been provided to one HSBC Affiliate entity as part of its integration to the HSBC Group after its acquisition in 2023.
- 22. Does the entity have a programme that sets minimum AML, CTF & Sanctions standards regarding the following components:

 - 22a. Appointed Officer with sufficient experience/expertise Yes
 - 22b. Adverse Information Screening Yes
 - 22c. Beneficial Ownership Yes
 - 22d. Cash Reporting Yes
 - 22e. Customer Due Diligence (CDD) Yes
 - 22f. Enhanced Due Diligence (EDD)..... Yes
 - 22g. Independent Testing Yes
 - 22h. Periodic Review Yes
 - 22i. Policies & Procedures Yes
 - 22j. PEP Screening Yes
 - 22k. Risk Assessment..... Yes
 - 22l. Sanctions Yes
 - 22m. Suspicious Activity Reporting..... Yes
 - 22n. Training & Education..... Yes
 - 22o. Transaction Monitoring Yes

- 23. How many full time employees are in Sanctions Compliance Department? 1 - 10
- 24. Is tl
anr
Cor
29 100
- 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 ou
of its AML, CTF & Sanctions programme? Yes
- 26a. Provide further details..... HSBC outsources some activities to third parties, including other HSBC entities, subject to HSBC's FC Policies & Programme eg audit requirements. HSBC will not outsource any Compliance function(s) which are prohibited under local regulations.
- 27. Does the entity have a whistle-blower policy? Yes
- 28. Are all answers provided to CBDDQ Questions 22-27 representative of all the legal entity's branches? Yes
- 29. Any additional information/ context to CBDDQ Questions 22-27 Additional clarification to Question CBDDQ 24: HSBC's Global Financial Crime Policy is approved annually by the Group Head of Financial Crime and updates are presented to senior management committees, including the Group Risk Management Meeting (GRMM), Group Risk Committee(GRC), a sub-committee of the HSBC Holdings PLC Board of Directors.

Additional clarification to Question CBDDQ 25 : The Group Financial Crime Risk Appetite Metrics are reported monthly to the Group Risk Management Meeting (GRMM) and Group Risk Committee (GRC).
In addition, a Financial Crime update by the Group Head

of Financial Crime is provided monthly to the Non Financial Risk Management Board and no less than quarterly to the GRMM and GRC. In addition, the Group MLRO publishes an annual report to the GRMM and GRC.

Additional clarification to Question CBDDQ 28: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

30. Has the entity documented policies and procedures consistent with applicable ABC regulations and requirements to (reasonably) prevent, detect and report bribery and corruption? **Yes**
31. Does the entity have an 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:
34. Joint ventures **Not applicable**
34. Third parties acting on behalf of the entity **Not applicable**
35. Does the entity have a global ABC policy that:
- 35 a. Prohibits the giving and promising, offering, giving or value, directly or indirectly, if influencing action or obtain an advantage **Yes**; includes anything
- 35b. Includes enhanced requirements regarding interaction with public officials? **Yes**
- 35c. 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 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**
39. Does the entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? **Yes**
40. Does the entity's ABC Enterprise Wide Risk Assessment cover the inherent risk components detailed below:
- 40a. Potential liability created by intermediaries and other third-party providers as appropriate **Yes**
- 40b. Corruption risks associated with the countries and industries in which the entity does business, directly or through intermediaries **Yes**

- 40c. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Yes
- 40d. Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions Yes
- 40e. Changes in business activity or the entity's corruption risk Yes
41. Does the entity's internal audit function or other internal or third party cover ABC policies and procedures? Yes
42. Does the entity provide mandatory ABC training to:
- 42a. Board and senior committee management Yes
- 42b. 1st Line of Defence Yes
- 42c. 2nd Line of Defence Yes
- 42d. 3rd Line of Defence Yes
- 42e. Third parties to which specific compliance activities subject to ABC risk have been outsourced Not applicable
- 42f. 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. Are all answers provided to CBDDQ Questions 30-43 representative of all the legal entity's branches? Yes
45. Any additional information/ context to CBDDQ Questions 30-43 Additional explanation to Question CBDDQ 34: Entities which are 50%+ owned or controlled are directly subject to the Group Policy. JVs or relevant third parties which are not directly subject to the FC Policy are contractually required to maintain controls to substantially the same standard as that set by the FC Policy.
Additional clarification to Question CBDDQ 44: Group Anti Bribery & Corruption Policy applies as a minimum to all HSBC Group Entities globally. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity (subsidiary or foreign branch) has published a separate CBDDQ detailing these.
- <https://www.hsbc.com/who-we-are/esg-and-responsible-business/fighting-financial-crime/financial-crime-risk-policies>
46. Has the entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:
- 46a. Money laundering? Yes
- 46b. Terrorist financing? Yes
- 46c. Sanctions violations? Yes
47. Are the entity's policies reviewed annually? Yes
48. Has the Entity chosen to compare its policies and procedures against:
- 48a. US Standards? Yes
- 48a1. Does the entity retain a record of the results? Yes
- 48b. EU Standards? Yes

- 48b1. Does the entity retain a record of the results?..... Yes
- 49. Does the entity have policies and procedures that:
 - 49a. Prohibit the opening and keeping of anonymous and fictitious named accounts..... Yes
 - 49b. Prohibit the opening banks and/or NBFIs Yes
 - 49c. Prohibit dealing with other entities to unlicensed banks Yes
 - 49d. Prohibit accounts/relationships with shell banks Yes
 - 49e. Prohibit dealing with another entity that provides services to shell banks Yes
 - 49f. Prohibit opening accounts with designated entities..... Yes
 - 49g. 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
 - 49h. Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates..... Yes
 - 49i. Define the process for escalating financial crime issues/potentially suspicious activity identified by employees Yes
 - 49j. Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk Yes
 - 49k. Define the process for exiting clients for financial crime reasons that applies to all branches and foreign branches Yes
 - 49l. Define the process and criteria for terminating customers that were previously high risk Yes
 - 49m. Outline the processes regarding screening for sanctions, reasons if they seek to re-establish a relationship Yes
 - PEPs and Adverse Media/ Negative News Yes
 - 49n. Outline the processes for maintenance of internal "watch lists" 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 policies and procedures in place with applicable laws? Yes
- 51a. What is the retention period 5 years or more
- 52. Are all answers provided to CBDDQ Questions 46-51a representative of all the legal entity's branches? Yes
- 53. Any additional information/ context to CBDDQ Questions 46-51a Additional clarification to Question CBDDQ 52: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.
- 54. Does the entity's AML & CTF Enterprise Wide Risk Assessment cover the inherent risk components detailed below:
 - 54a. Client Yes
 - 54b. Product..... Yes

- 54c. Channel Yes
- 54d. Geography Yes
- 55. Does the entity's AML & CTF Enterprise Wide Risk Assessment cover the controls effectiveness components detailed below:
 - 55a. Transaction Monitoring Yes
 - 55b. Customer Due Diligence Yes
 - 55c. PEP identification..... Yes
 - 55d. Transaction Screening Yes
 - 55e. Name Screening against Adverse Media & Negative News Yes
 - 55f. Training and Education Yes
 - 55g. Governance Yes
 - 55h. Management information Yes
- 56. Has the Entity's AML & CTF EWRA been completed in the last 12 months?..... Yes
- 57. Does the entity's sanctions Enterprise Wide Risk Assessment cover the inherent risk components detailed below:
 - 57a. Client Yes
 - 57b. Product Yes
 - 57c. Channel Yes
 - 57d. Geography Yes
- 58. Does the entity's sanctions Enterprise Wide Risk Assessment cover the controls effectiveness components detailed below:
 - 58 a . C u s Yes
 - 58 b . Governan..... Yes
 - 58 c . List Yes
 - 58 d . Management information Yes
 - 58 e . Name Yes
 - 58 f . Transaction Screening..... Yes
 - 58 g . Training and Education Yes
- 59. Has the Entity's Sanction 12 months?..... Yes
- 60. Are all answers provided to CBDDQ Questions 54-59a representative of all the legal entity's branches?..... Yes
- 61. Any additional information/ context to CBDDQ Questions 54-59a Additional clarification to Question CBDDQ 60: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities and all HSBC countries are responsible for performing the inherent risk likelihood assessment for all applicable businesses / Assessment Units (AU) that reside in the country - including Affiliates - by responding to a standard questionnaire. Where local variations exist, these are factored in the EWRA methodology through the AU's answers to the Country Specific Risk section, which takes into account any specific risks not factored into the standard questionnaire.
- 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:

- 64a. Customer identification Yes
- 64b. Expected activity Yes
- 64c. Nature of business/employment Yes
- 64d. Ownership structure Yes
- 64e. Product usage Yes
- 64f. Purpose and nature of relationship Yes
- 64g. Source of funds Yes
- 64h. Source of wealth Yes

- 65. Are each of the following identified:

 - 65a. Ultimate Beneficial Ownership Yes
 - 65a1. Are ultimate beneficial owners verified Yes
 - 65b. Authorised signatories (where applicable) Yes
 - 65c. Key controllers Yes
 - 65d. Other relevant parties Yes
 - . Other type of relevant parties The type of relevant party identified will depend on the customer type e.g. nominee companies; Settlor; Third Parties; Beneficiaries; Trustees etc.

- 66. What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 10%
- 67. Does the due diligence process result in customers receiving a risk classification? Yes

- 67a. What factors/criteria are used to determine the customer's risk classification?
 - Product usage
 - Geography
 - Business type / industry
 - Legal entity type
 - Adverse information
 - Other
 - Other

- Other PEP presence, High risk factors as defined by Country regulatory standards

- 68. For high risk non-individual customers, is a site visit a part of your KYC process? Yes
- 68a. If Y, is this at:

 - 68a1. On-boarding Yes
 - 68a2. KYC Renewal Yes
 - 68a3. Trigger event Yes
 - 68a4. Other No

- 69. Does the entity have a risk based approach to screening customers for adverse media/negative news? Yes
- 69a. When is it performed?
 - At on-boarding
 - KYC renewal
 - Trigger event
 - Other

70. What is the method used by the entity to screen for adverse media/negative news? **Manual**
Automated
Other
71. Does the entity have a risk based approach to screening customers and connected parties to determine whether they **Yes**

are, or are controlled by PEPs?

71a. If Y, is this at:

71a1. On-boarding Yes

71a2. KYC Renewal..... Yes

71a3. Trigger event Yes

72. What is the method used by the entity to screen PEPs? Manual
Automated
Other

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

74a. If yes "Select all that apply"

74a1. Less than one year..... Yes

74a2. 1 - 2 years Yes

74a3. 3 - 4 years Yes

74a4. 5 years or more Yes

74a5. Trigger-based or perpetual monitoring reviews Yes

74a6. Other (Please specify)..... Not applicable.

75. Does the entity maintain and report metrics on current and past due periodic or trigger event due diligence reviews? Yes

76. From the list below, which categories of customers or industries are subject to Enhanced Due Diligence (EDD) and/or are restricted, or prohibited by the entity's FCC programme?

76 a. Arms, defence, military EDD on a risk based approach

76 b. Respondent Banks KYC Registry EDD on a risk based approach

76b1. Does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Yes

76 c. Embassies / Consulates..... EDD on a risk based approach

76 d. Extractive industries EDD on a risk based approach

76 e. Gambling Customers..... EDD on a risk based approach

76 f. General Trading Companies EDD on a risk based approach

76 g. Marijuana-related Entities..... EDD on a risk based approach

76 h. MSB/ MVTs customers..... EDD on a risk based approach

76 i. Non-account customers Restricted

77. Provide details of the restriction Services that HSBC provides to customers are in-scope of applicable legal and regulatory requirements for appropriate AML controls, e.g. Identification and Verification, screening etc. Remittance Services for Non-Customers (including Occasional Transactions) are prohibited, unless local regulators require the offering of local remittance services

76 j. Non-Government Organisations..... EDD on a risk based approach

- 7 6 k . Non-resident customers EDD on a risk based approach
- 7 6 l . Nuclear power EDD on a risk based approach
- 7 6 m . Payment Service Providers EDD on a risk based approach

76n.	PEPs	EDD on a risk based approach
76o.	PEP Close Associates EDD on a risk based approach	
76p.	PEP related	EDD on a risk based approach
76q.	Precious metals and stones.....	EDD on a risk based approach
76r.	Red light businesses / Adult entertainment.....	EDD on a risk based approach
76s.	Regulated charities.....	EDD on a risk based approach
76t.	Shell banks.....	Prohibited
76u.	Travel and Tour Companies	EDD on a risk based approach
76v.	Unregulated charities.....	EDD on a risk based approach
76w.	Used Car Dealers	EDD on a risk based approach
76x.	Virtual Asset Service Providers.....	Restricted
77.	Provide details of the restriction	Entities solely engaged in DACs are generally prohibited per policy. Other VASPs may still be permitted on a risk based approach
76y.	Other (Specify)	Entities or individuals that pose significant reputational risk to HSBC.
78.	Does EDD require senior business management and/or compliance approval?	Yes
78a.	If Y select from:	Senior business management Compliance Other
79.	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, i	
80.	Does the entity perform an on clients subject to EDD?	Yes
81.	Are all answers provided to CBDDQ Questions 62 -80 representative of all the legal entity's branches?	Yes
82.	Any additional information/ context to CBDDQ Questions 62-81a	Additional clarification to Question CBDDQ 76a: Applicable restrictions: Additional high risk customer classification and due diligence, increased monitoring, customer selection and approval process. https://www.hsbc.com/who-we-are/our-climate-strategy/sustainability-risk Additional clarification to Question CBDDQ 76c: Applicable restrictions: For certain Embassy Relationships, additional high risk customer classification and increased monitoring and approval process applies. Additional clarification to Question CBDDQ 76d: Applicable restrictions: Additional high risk customer classification and due diligence, increased monitoring, customer selection and approval process. https://www.hsbc.com/who-we-are/our-climate-strategy/sustainability-risk Additional clarification to Question CBDDQ 76e: Applicable restrictions: Additional high risk customer classification and due diligence, increased monitoring, customer selection and approval process. Unlicensed or unregulated gambling operators are prohibited Additional clarification to Question CBDDQ 76g: Applicable restrictions: Providing products and services is dependent upon a number of factors including but not limited to: the country's laws and regulations and the flow of funds.

Additional clarification to Question CBDDQ 76h:
Applicable restrictions: Dependent on risk involved and subject to enhanced approval process.

Additional clarification to Question CBDDQ 76l:
Restrictions will apply where a customer's existing business is inconsistent with IAEA standards or practices listed under HSBC Energy (Sustainability Risk) policy, <https://www.hsbc.com/who-we-are/our-climate-strategy/sustainability-risk>

Additional clarification to Question CBDDQ 76m:
Applicable restrictions: Dependent on type of PSP, its business profile and risk. All are subject to enhanced approval process.

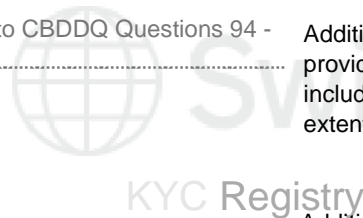
Additional clarification to Question CBDDQ 81: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

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? Manual
Automated
Other
- 84a. What types of transactions are monitored manually? Manual TM is done where it is deemed appropriate considering the size and nature of the business. All large business areas will use Automated TM, with select small markets for certain lines of business may rely on manual monitoring in the form of exception reports or manual Red Flag processes.
- 84b. Are internal system or vendor-sourced tools n
ed tools
- 84b1. If "vendor-sourced tool" : What is the name of the vendor/tool?
..... Commercially sensitive information
- 84b2. When was the tool last updated? < 1 year
- 84b3. When was the automated Transaction Monitoring (TM) last calibrated? < 1 year
85. Does the entity have regular reviews of suspicious transactions? Yes
- 85a. 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. Are all answers provided to CBDDQ Questions 62 -89 representative of all the legal entity's branches? Yes
91. Any additional information/ context to CBDDQ Questions 62 - 89 Additional information on Questions CBDDQ 84b2 and 84b3: HSBC Transaction Monitoring (TM) platforms include in-house built / maintained systems, vendor procured systems and

components that are a mix of both which are regularly updated. Also, there is a change process established to enable the ongoing calibration of the TM applications.

Additional clarification to Question CBDDQ 90: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

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:
- 93a. FATF Recommendation 16 **Yes**
- 93b. Local Regulations..... **Yes**
- 93b1. Which regulation? **Ley 19.913, Recopilación Actualizada de Normas 1-14 (Comisión de Mercado Financiero)**
94. Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? **Yes**
95. Does the Entity have controls to support the inclusion of required beneficiary in cross border payment messages? **Yes**
- 95a. If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? **Yes**
96. Are all answers provided to CBDDQ Questions 94 - 95a representative of all the legal entity's branches? **Yes**
97. Any additional information/ context to CBDDQ Questions 94 - 95a **Additional clarification to Question CBDDQ 95a: When provided with beneficiary address information, HSBC will include it in the outgoing payment message, to the extent possible**
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**



Additional clarification to Question CBDDQ 96: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

- screening process? Automated
Other
- 102a1. Are internal system or vendor-sourced tools used? Internal System
Vendor-sourced tools
Other
- 102a1a If a vendor-sourced tool: What is the name of the vendor/tool?
..... Commercially sensitive information.
- 102a2. 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? < 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 for the sanctions screening process? Manual
Automated
Other
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. What are the sanctions lists used by the entity in its sanctions screening processes?
- 106a. Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data
- 106b. 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
- 106c. Office of Financial Sanctions Implementation HMT (OFSI) Used for screening customers and beneficial owners and for filtering transactional data
- 106d. European Union Consolidated List (..... screening customers and beneficial owners and transactional data
- 106f. Any other sanctions list used by the entity in its sanctions screening process? **Screening customers and transactions globally against the sanctions lists issued by the UN, UK and US. Lists issued by G7 countries screened only in the applicable jurisdiction.**
Screening locally against other sanctions lists that apply to HSBC's operations in a particular jurisdiction, including sanctions imposed by the EU and HK in those jurisdictions.
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:
- 107a. Customer Data Within 3 to 5 business days
- 107b. Transactions Within 3 to 5 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. Are all answers provided to CBDDQ Questions 98 -108 representative of all the legal entity's branches? Yes
110. Any additional information/ context to CBDDQ Questions 98 - 108 **Additional clarification to Question CBDDQ 101: Ongoing and daily screening on Customers and Connected parties is performed on delta changes.**

Additional clarification to Question CBDDQ 102: There are a small number of instances where manual screening of Customers is undertaken (subject to governance being in place (e.g. Dispensation or Local Financial Crime Policy)) but generally screening is undertaken at onboarding and periodically using an automated screening solution.

Additional clarification to Question CBDDQ 102a2: Effectiveness testing is completed monthly by assurance teams. In addition, the automated tools are subject to extensive testing by an independent testing function on a periodic basis.

Additional clarification to Question CBDDQ 104: There are a small number of instances where manual screening of Customers is undertaken (subject to governance being in place (e.g. Dispensation or Local Financial Crime Policy)) but generally screening is undertaken at onboarding and periodically using an automated screening solution.

Additional clarification to Question in CBDDQ106d: Customers and beneficial owners are screened globally by all HSBC Group Entities. Transactional data is only required, under HSBC's Global Financial Crime Policy, to be screened against the EU sanctions lists by HSBC entities that operate within (or where performing transactions related to) the EU or are subject to EU jurisdiction. Where local variations exist to comply with local laws and regulations, or to manage material time risk, the applicable HSBC Group Entity has published a separate CBDDQ detailing these.



106e: L

Additional clarification to Question CBDDQ 106e: Customers and beneficial owners are screened globally against customers and transactions globally. Lists issued by the relevant competent authorities in the UK (e.g. HMT's OFSI) and the US (e.g. OFAC) are screened

(e.g. HMT's OFSI) and the US (e.g. OFAC) are screened

Additional clarification to Question CBDDQ 109: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

- 111. Does the entity provide mandatory training, which includes:
 - 111a. Identification and reporting of transactions to government authorities Yes
 - 111b. Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Yes
 - 111c. Internal policies for controlling money laundering, terrorist financing and sanctions violations Yes
 - 111d. New issues that occur in the market, emerging risks, regulatory actions or new regulations Yes
 - 111e. Conduct and Culture Yes

- 111f. Fraud Yes
112. Is the above mandatory training provided to:
- 112a. Board and senior committee management Yes
- 112b. 1st Line of Defence Yes
- 112c. 2nd Line of Defence..... Yes
- 112d. 3rd Line of Defence Yes
- 112e. Third parties to which specific Fi activities have been outsourced Yes
- 112f. Non-employed workers (contractors/consultants) Yes
113. Does the entity provide AML, Sanctions & CTF training that is targeted to specific roles, responsibilities and HR products, services and activities?..... Yes
114. Does the entity provide Sanctions staff? Yes
- 114a. If Y, how frequently is training delivered? Annually
115. Are all answers provided to CBDDQ Questions 111 - 114a representative of all the legal entity's branches? Yes
116. Any additional information/ context to CBDDQ Questions 111 - 114a Additional clarification to Question CBDDQ 115: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.
117. Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate to the independent Audit function)?..... Yes
118. Does the entity have a programme wide risk based and independent Quality Assurance or Compliance Testing process (separate to the independent Audit function)? Yes
119. Are all answers provided to CBDDQ Questions 117 - 118 representative of all the legal entity's branches? Yes
120. Any additional information/ context to CBDDQ Questions 117 - 118 Additional clarification to Question CBDDQ 119: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.
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:
- 122a. Internal Audit Department Component based reviews
- 122b. External Third Party Component based reviews
123. Does the internal audit function or other independent third party cover the following areas:
- 123a. AML, CTF, ABC, Fraud and Sanctions policy and procedures Yes
- 123b. Enterprise Wide Risk Assessment Yes
- 123c. Governance Yes

123d.	KYC/CDD/EDD and underlying methodologies.....	Yes
123e.	Name Screening & List Management.....	Yes
123f.	Reporting/Metrics & Management Information.....	Yes
123g.	Suspicious Activity Filing.....	Yes
123h.	Technology.....	Yes
123i.	Transaction Monitoring	Yes
123j.	Transaction Screening including for Sanctions	Yes
123k.	Training & Education	Yes
123l.	Other area	N/A
124.	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125.	Are all answers provided to CBDDQ Questions 121 - 124 representative of all the legal entity's branches?	Yes
126.	Any additional information/ context to CBDDQ Questions 121 - 124	Additional clarification to Question CBDDQ 125: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.
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 information to support its fraud control including IP address, GPS location, and/or device information?	Yes
131.	Are all answers provided to CBDDQ Questions 127 - 130 representative of all the legal entity's branches?	Yes
132.	Any additional information / context to CBDDQ Questions 127-130	The above answers (CBDDQ 127-130) have been provided based on the Group Policy, which sets the minimum standard. Local variations may apply in line with local policies or regulations, where these require a higher standard to be applied.

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Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent poseen holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

4iS (b) (1) C. CIA L (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

[Signature] (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

26-5) AS (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

[Handwritten Signature] 10 Jul 24 (Signature & Date)

[Handwritten Signature] 10 Jul 24 (Signature & Date)