the Wolfsberg Group

Financial Institution Name: Location (Country) :

King's Town Bank Co.,Ltd Tainan,Taiwan

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. ENTIT	Y & OWNERSHIP	
1	Full Legal Name	King's Town Bank Co.,Ltd
2	Append a list of foreign branches which are covered	No
	by this questionnaire	55-512
3	Full Legal (Registered) Address	N. 700 C. A.M. B. H. A. C. A. B. A. T. C. T. T. T. C. T. T. T. T. C. T. T. T. C. T.
		No. 506, Sec. 1, Ximen Rd., West Central Dist., Tainan City 700019, Taiwan (R.O.C.)
4	Full Primary Business Address (if different from	
	above)	
		Trial transfer and the
-	Date of Entity incorporation/establishment	
5	Date of Entity incorporation/establishment	1951/7/11
6	Select type of ownership and append an ownership chart if available	
0 -		V
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker	Taiwan Stock Exchange(TWSE) stock code:2809
	symbol	Stock code.2009
6 b	Member Owned/Mutual	No 🔻
6 c	Government or State Owned by 25% or more	No 🔻
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	0%
	shares	0 70
8	Does the Entity, or any of its branches, operate under	No 🔻
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
	and the second of the second o	
9	Does the Bank have a Virtual Bank License or	No V
	provide services only through online channels?	NO
10	Name of primary financial regulator/supervisory	Financial Supervisory Commission R.O.C.(Taiwan)
	authority	a contraction of the contraction
11	Provide Legal Entity Identifier (LEI) if available	
		ALTERNATION OF LOCAL MARKET, CO.
		the state of the s
		(A. C. Company of the control of the
	Provide the full legal name of the ultimate parent (if	
12	IF TO VIGE LITE TO LEGAL HATTIE OF THE GRANTIALE PAREITY IN	
12	different from the Entity completing the DDQ)	
12		

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
14	Select the business areas applicable to the Entity	Life to the service of the service o
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	
	9	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No 🔽
14 i	Multilateral Development Bank	No 🔻
14 j	Wealth Management	Yes
14 k	Other (please explain)	
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 V
15 a	If Y, provide the top five countries where the non- resident customers are located.	
40		
16	Select the closest value:	
16 a	Number of employees	501-1000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches.	Tes L
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 000011	CTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No 🗔
19 a1	lf Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSs	Please select
19 a1h3	PSPs	Please select
		. 10000 00100

19 a1i			
	Does the Entity have processes and procedures		
	in place to identify downstream relationships with	Please select	
	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	and the same of th
19 f	International Cash Letter	No	
		5000	
19 g	Low Price Securities	No	
19 h	Payable Through Accounts	No	
19 I	Payment services to non-bank entities who may		22.0
	then offer third party payment services to their customers?	No	~
19 i1	If Y, please select all that apply below?		
19 i2	Third Party Payment Service Providers	Please select	
19 I3	Virtual Asset Service Providers (VASPs)	Please select	
19 14	eCommerce Platforms	Please select	
19 i5	Other - Please explain	Fledse select	
1913	Gulei - r lease explain		
19 J	Private Banking	No	
19 k	Remote Deposit Capture (RDC)	No .	
19 I	Sponsoring Private ATMs	No	
19 m	Stored Value Instruments	No	
19 n	Trade Finance	Yes	
19 o	Virtual Assets	No	-
19 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:		
10 1			
19 p1	Check cashing service	Yes	
19 p1a	If yes, state the applicable level of due diligence	Identification and verification	
19 p2	Wire transfers	No	
19 p2a	If yes, state the applicable level of due diligence	Please select	
19 p3	Foreign currency conversion	Yes	
19 p3a	If yes, state the applicable level of due diligence	Identification and verification	
19 p4	Sale of Monetary Instruments	No	
19 p4a	If yes, state the applicable level of due diligence	Please select	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Western Union/ Identification and verification	
19 q	Other high-risk products and services identified by the Entity (please specify)	None, the Entity does not provide any additional high risk products.	-
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes	▼
20 20 a	Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes	<u></u>
	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes	Y
	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes	V
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes	7
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		V
20 a 21 3. AML, C 22	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes	V
20 a 21 3. AML, C 22	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening		▼ ■
20 a 21 3. AML, C 22 22 a 22 b	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes Yes Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 d	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes Yes Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 d 22 e	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes Yes Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 g	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 e 22 f 22 g 22 h	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 e 22 f 22 g 22 h	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes	
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes	
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 p 22 p	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes	

22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	
22 o	Transaction Monitoring	Yes	E
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	V
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	~
26 a	If Y, provide further details		
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	~
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI	BRIBERY & CORRUPTION		- 16-01
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	-
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	T
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:	AND SHOP IN THE PARTY OF THE PA	mile
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	•
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	V
35 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	V
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	T
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.	•	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	-
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	
	components detailed below:		

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly	Yes
	or through intermediaries	165
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
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	No 🔻
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 ▼
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5 AMI (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
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	Please select
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	Please select
49 49 a	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes
49 b	and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes V
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes V
49 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes 🔻
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and	

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49 i			
	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	~
49 J	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	_
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	-
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	V
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	-
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	V
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	Ī
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	Ŧ
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.		
C AMI OT	FF & SANCTIONS RISK ASSESSMENT		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Does the Entity's AML & CTF EWRA cover the	Yes	
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes	
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes	\ \frac{1}{2}
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes Yes	
54 a 54 b 54 c 54 d 55 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence	Yes Yes Yes	
54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes	
54 a 54 b 54 c 54 d 55 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes	
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes	
54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes	
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes	
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	
54 a 54 b 54 c 54 d 55 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes	
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes	
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes	
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes	
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 b 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes	
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes	
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes	
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes	
54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 a 57 a 57 a 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes	

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
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
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
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
64 c	Nature of business/employment	Yes Yes Yes
64 d	Ownership structure	Yes
64 e 64 f	Product usage Purpose and nature of relationship	
64 g	Source of funds	Yes Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 с	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
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 67 a3	Geography Business Type/Industry	Yes Yes
67 a3	Business Type/Industry Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
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 Yes
68 a2 68 a3	KYC renewal Trigger event	Yes Yes
68 a4	Other	No 🗔
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	V
69 a1	Onboarding KYC repowel	Yes S
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes	V
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Automated	¥
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?		~
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Automated	. 7
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	V
74 a	If yes, select all that apply:	200 年 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
74 a1 74 a2	Less than one year	Yes	
74 a2 74 a3	1 – 2 years 3 – 4 years	Yes Yes	
74 a4	5 years or more	Yes	Y
74 a5	Trigger-based or perpetual monitoring reviews		V
74 a6	Other (Please specify)	high risk: once a year medium risk: once every three years low risk: once every seven years.	لگ
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	~
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
76 a	Arms, defence, military	Prohibited	Y
76 b	Respondent Banks	Do not have this category of customer or industry	V
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select	
76 c	Embassies/Consulates	EDD on risk-based approach	V
76 d	Extractive industries		Y
76 e	Gambling customers		Y
76 f	General Trading Companies		V
76 g	Marijuana-related Entities		7
76 h	MSB/MVTS customers		V
76 i	Non-account customers	Restricted	
76 J	Non-Government Organisations	EDD on risk-based approach	7
76 k	Non-resident customers		Y
76 I	Nuclear power		V
76 m	Payment Service Providers		7
76 n	PEPs		Y
76 o	PEP Close Associates		Y
76 p	PEP Related		Y
76 q	Precious metals and stones		V
76 r	Red light businesses/Adult entertainment		V
76 s	Regulated charities		Y
76 t	Shell banks		7
76 u	Travel and Tour Companies		V
76 v	Unregulated charities		V
76 w	Used Car Dealers		V
76 x	Virtual Asset Service Providers	A 100 CA	Y
76 y	Other (specify)		
77	If restricted, provide details of the restriction	76i & 76x:The Entity required documents for identifying and verifying customer identity. 76i:The Entity put limits on the transaction amount of cross-border remittances for non-account customers.	
78	Does EDD require senior business management and/ or compliance approval?	Yes	~

78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for	
15	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?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Suspicious transactions are monitored by front-line staff. He/She will undertake EDD process to obtain additional relevant information such as transaction purpose, source of funds to evaluate the appropriateness of this transaction.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Suspicious Transaction Detection System for AML.
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	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMI	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
		-

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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
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Money Laundering Control Act Regulations Governing Foreign Exchange Business of Banking Enterprises
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	LexisNexis-ACCUITY
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)	1-2 years
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
	What is the method used by the Entity?	

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)	TAIWAN LIST \ WORLD BANK \ INTERPOL \ Japan - Ministry of Finance \ Japan METI End User List \ 311 \ BISN \ BIS \ BOFE \ CAATSA Section 231 List \ Ministry of Public Security of China List \ FATF Deficient Jurisdictions List \ U.S. State Department Terrorist Exclusion List \ CHINESE MINISTRY \ UN Travel Restrictions \ Malaysian Ministry of Home Affairs List \ Interpol China National Central Bureau Most Wanted Fugitives List
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No -
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	NG'& EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
11 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
11 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
11 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
11 e	Conduct and Culture	Yes
11 f	Fraud	Yes
12	Is the above mandatory training provided to:	
12 a	Board and Senior Committee Management	Yes
12 b	1st Line of Defence	Yes
12 c	2nd Line of Defence	Yes
12 d	3rd Line of Defence	Yes
12 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
12 f	Non-employed workers (contractors/consultants)	Not applicable
13	high-risk products, services and activities?	Yes
14	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
14 a	If Y, how frequently is training delivered?	Annually
15	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	100

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUAL	TY ASSURANCE /COMPLIANCE TESTING	\$\tag{\psi_1, \psi_2, \text{\tinx}\text{\tinx}\text{\tinx}\text{\tinit}\text{\texict{\text{\text{\text{\texit\tint{\text{\text{\text{\text{\tin}\tint{\text{\text{\texi}
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
	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
123 e 123 f	Reporting/Metrics & Management Information	Yes Yes
123 g	Suspicious Activity Filing	Yes Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 J	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify) 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.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU	ID	
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 V

129	Does the Entity have real time monitoring to detect fraud?	Yes	
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes	
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes	
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
132	If appropriate, provide any additional information/context to the answers in this section.		
Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)			
King's Town Bank Co.,Ltd (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.			
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.			
The Financial Institution commits to file accurate supplemental information on a timely basis.			
I, Olivia Tai (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.			
I, _Qi-Wei, Yu (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.			
Divide Tai >1 Apr 202 (Signature & Date) Divide Tou 30 kpr. > (Signature & Date)			
Qu Jon 30 Mar. X (Signature & Date)			

