## the Wolfsberg Group

Financial Institution Name: Location (Country) :

JSCB "Business Development Bank" Republic of Uzbekistan

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	A CONTRACTOR OF THE CONTRACTOR
1. ENTIT	Y & OWNERSHIP	Answer
1	Full Legal Name	
		JSCB "Business Development Bank"
2	Append a list of foreign branches which are covered	
	by this questionnaire	The Devil
		The Bank does not have foreign branches
	0	0
3	Full Legal (Registered) Address	
	an alogar (registered) Address	18A, A.Navoiy str., Tashkent city, Republic of Uzbekistan 100011
		The state of Septimisal 100011
		· ·
4	Full Primary Puginess Add (% 1)%	
	Full Primary Business Address (if different from above)	
5	Date of Entity is	
-	Date of Entity incorporation/establishment	JSCB "Businee Development Pople" was in a second of the se
		JSCB "Businee Development Bank" was incorporated on september 4 in 2023, under the Resolution of the President of the Republic of Uzbekistan. The Bank was established on the base of the former CISC "inchipe Quilible Benk".
		Bank was established on the base of the former OSJB "G'allabank" on avgust 2 in 1994
6	Select type of ownership and append an ownership	
a a	chart if available	
6 a 1	Publicly Traded (25% of shares publicly traded)	No
) d l	If Y, indicate the exchange traded on and ticker	
	symbol	
	1	
b	Member Owned/Mutual	No
C	Government or State Owned by 25% or more	Yes
d	Privately Owned	No
d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
	% of the Entity's total shares composed of bearer	The state of the s
	shares	Entity does not have any bearer shares in issue
		Littly does not have any bearer shares in issue
	Does the Entity, or any of its branches, operate under	
	an Olishore Banking License (OBL)?	No
a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
27422.2	Does the Bank have a Virtual Bank License or	
	provide services only through online channels?	No
	Name of primary financial regulator/supervisory	
1	authority	The Central Bank of the Republic of Uzbekistan, Department for Combating Economic Crimes under the General Prosecutor's Office of the Parties
1		under the General Prosecutor's Office of the Republic of Uzbekistan
		The Republic of Ozbekistan
		o the state of the state of ozbekstall
	Provide Legal Entity Identifier (LEI) if available	
	Provide Legal Entity Identifier (LEI) if available	QQB has obtained following LEI code 254900QY9X6RQR3I MK58
	Provide Legal Entity Identifier (LEI) if available	QQB has obtained following LEI code 254900QY9X6ROR3LMK58 Registration status is active.
	Provide Legal Entity Identifier (LEI) if available	QQB has obtained following LEI code 254900QY9X6RQR3I MK58
		QQB has obtained following LEI code 254900QY9X6RQR3I MK58
Į.	Provide the full legal name of the ultimate parent (if	QQB has obtained following LEI code 254900QY9X6ROR3LMK58 Registration status is active.
Į.	Provide the full legal name of the ultimate parent (if	QQB has obtained following LEI code 254900QY9X6RQR3I MK58

13	Jurisdiction of licensing authority and regulator of ultimate parent	Republic of Uzbekistan
	unimate parent	
14	Select the business areas applicable to the Entity	
4 a		Yes
14 b	Private Banking	No ,
14 c	Commercial Banking	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	No
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 .
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1001-5000
-		
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PRODU	JCTS & SERVICES	THE CONTRACTOR OF THE PARTY OF
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	IfY	
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)?	
	MCDa	No
19 a1h1	MSBs	
19 a1h1 19 a1h2	MVTSs PSPs	No .

19 a1i	Does the Entity have processes and procedures	
0000	in place to identify downstream relationships with MSBs /MVTSs/PSPs?	No No
19 b	Cross-Border Bulk Cash Delivery	
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g		No
	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	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)	
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	Please select
	Table Violet Capitali	
19 j	Private Banking	N.
19 k	Remote Deposit Capture (RDC)	No .
191	Sponsoring Private ATMs	No
19 m		No
	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 р	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	
19 p1a	Crieck cashing service	No
19 p2	If yes, state the applicable level of due diligence	Please select
	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
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.	-
19 q	Other high-risk products and services identified by the Entity (please specify)	N/A
10	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
0 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
1	If appropriate, provide any additional information/context to the answers in this section.	
. AML, CT	IF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum	
	following components:	
2 a	Appointed Officer with sufficient	Yes
b	Adverse Information Screening	Yes
С	Beneficial Own and	Yes
d	Cach Paparting	
e	CDD	Yes
f	EDD	Yes
		Yes
	Indonesia T. II	
g	Independent Testing	Yes
g h	Independent Testing Periodic Review	
g h i	Independent Testing Periodic Review Policies and Procedures	/es
g h i	Independent Testing Periodic Review Policies and Procedures PEP Streeties	/es /es
g h i	Independent Testing Periodic Review Policies and Procedures PEP Screening Nisk Assessment	/es /es
g h i j	Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment Sanctions	/es /es

22 m	Suspicious Activity Reporting	Yes
22 n		Yes
22 o		Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
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	
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
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:	Third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessmen (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
	Potential liability created by intermediaries and	

40 b	Corruption risks associated with the countries and industries in which the Entity does business, direc or through intermediaries	Yes Yes
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entitle or public officials	S Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	yes 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		
42 a	Does the Entity provide mandatory ABC training to:  Board and senior Committee Management	
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	Yes
42 f	subject to ABC risk have been outsourced  Non-employed workers as appropriate	Not Applicable
43	(contractors/consultants)	Not Applicable
44	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
	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.	
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	
46 b	Terrorist financing	Yes
16 c	Sanctions violations	Yes
17	Are the Entity's policies and procedures updated at	Yes
18	least annually?	Yes
	Has the Entity chosen to compare its policies and procedures against:	
8 a	U.S. Standards	Yes
8 a1	If Y, does the Entity retain a record of the results?	Yes
***************************************	EU Standards	Yes
8 b1	If Y, does the Entity retain a record of the results?	Yes
9 9 a	Does the Entity have policies and procedures that:	
эа	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
9 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
9 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
9 d	Prohibit accounts/relationships with shell banks	
9 е	Prohibit dealing with another entity that provides services to shell banks	Yes Yes
9 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
9 g	Prohibit opening and keeping of accounts for any of	
) h	unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents  Assess the risks of relationships with domestic and	Yes

19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
19 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
19 I	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
19 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
19 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6. AML, CT 54	F & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	V
		Yes
54 b	Product	Yes
54 b 54 c		Yes Yes
	Product Channel Geography	Yes
54 c	Product Channel	Yes Yes Yes Yes
54 c 54 d 55	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 c 54 d 55 55 55 a 55 b	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes
54 c 54 d 55 55 a 55 b 55 c	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 Yes
54 c 54 d 55 55 55 a 55 b	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 Yes
54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 e	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 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e	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
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e	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?	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	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.	Yes
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	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 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 a 55 a 57 57 a	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	Yes
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 57 a 57 a 57 c 57 d	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 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	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 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 57 a 57 a 57 c 57 d	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	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 57 a 57 a 57 c 57 d 58	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	
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
"	the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions	
	EWRA was completed.	
	and a surprotod.	
60	Confine that II	
00	Confirm that all responses provided in the above	Yes
60 a	Section are representative of all the LE's branches	1550007
ou a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchies that this applies to.	
61		
01	If appropriate, provide any additional	
	information/context to the answers in this section.	
	, 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	Yes
	onboarding or within 30 days?	Total III
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
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	162
65 a	Ultimate beneficial ownership	Yes
55 a1	Are ultimate beneficial owners verified?	
55 b	Authorised signatories (where applicable)	Yes Yes
65 c	Key controllers	
55 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold	Yes
	applied to beneficial ownership identification?	10%
7	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
7 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
7 a1	Product Usage	Voc
7 a2	Geography	Yes
7 a3	Business Type/Industry	Yes
7 a4	Legal Entity type	Yes
7 a5	Adverse Information	Yes
7 a6	Other (specify)	Yes
	(opdony)	
8	For high risk non-individual customers, is a site visit a	
	part of your KYC process?	Yes
3 а	If Y, is this at:	
3 a 1	Onhooveling	
3 a 2	KVC ronewal	Yes
3 a3	Trigger event	Yes
3 a4	Trigger event	Yes
a4a	Other	No
u-7a	If yes, please specify "Other"	
	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Voc.
	News?	Yes
а	If Y, is this at:	
a1	Onhoarding	
	1	Yes
a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Automated
	Adverse Media/Negative News?	Automated
'1	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
'1 a1	Onboarding	Yes
1 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	No
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
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
76 b	Respondent Banks	Prohibited
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
	Marijuana-related Entities	Prohibited
76 g		Do not have this category of customer or industry
76 h	MSB/MVTS customers	
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
	PEP Related	EDD on risk-based approach
76 p	Precious metals and stones	Do not have this category of customer or industry
76 q		Prohibited
76 r	Red light businesses/Adult entertainment	
76 s	Regulated charities	Do not have this category of customer or industry
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Do not have this category of customer or industry
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If V indicate whe arrived the	
79	If Y indicate who provides the approval:  Does the Entity have specific procedures for	Both
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents	No
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		T
	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
34 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	1. LLC "Fido Biznes": "Vnutrenniy Kontrol" (Internal Control) 2. REFINITIV (refinitiv limited): World Check 3. SWIFT Payment Control system 4. SWIFT Transaction Screening tools
34 b2	When was the tool last updated?	<1 year
34 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
35	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
5 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes '
6	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
8	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
)	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
)	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
а	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.	
PAYMEN	I NT TRANSPARENCY	
	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	es es

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	Law of the republic of Uzbekistan on "Counteracting legalization of proceeds from criminal activity and financing of terrorism" (#660-11) The policy of the Bank on AML & CTF dd. 18.11.2022 (№403) Internal control rules on AML, CFT & CPF in commercial banks dd. May 23, 2017, № 2886
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. SANC	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?	1. LLC "Fido Biznes": "Vnutrenniy Kontrol" (Internal Control) 2. REFINITIV (refinitiv limited): World Check 3. SWIFT Payment Control system 4. SWIFT Transaction Screening tools
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
		Automated

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)	f Used for screening customers and beneficial owners and for filtering transactional data
106 с	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)	and to intering transactional data
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 No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	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.	
11 TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
I11 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
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)	No
13	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and 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?	Approlli
15	Confirm that all responses provided in the above	Annually
	Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALIT 117	Y ASSURANCE /COMPLIANCE TESTING  Does the Entity have a program wide risk based	CONTROL OF THE STATE OF THE STA
117	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		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 g	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference is relate to and the branch ies that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

129		
	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	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)		
JSCB "Business Development Bank"  (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.		
Bobojonov Bobokhon Pulatovich (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that have read and understood this declaration, that lam authorised to execute this declaration on behalf of the Financial institution.		
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.  28.12.2023		
28.12.2023 (Signature & Date)  (Signature & Date)		