## the Wolfsberg Group

Financial Institution Name: ALPHA BANK CYPRUS LIMITED

Location (Country): 3 Lemesou Avenue, 2112 Nicosia, Cyprus

No#	Question	Answer
1. EN	TITY & OWNERSHIP	
1	Full Legal Name	Alpha Bank Cyprus Limited
2	Append a list of branches which are covered by this questionnaire	All Alpha Banks Branches
3	Full Legal (Registered) Address	Gonia Cheilonos & Gladstonos Plateia Stylianou7 Lena, Nicosia, Cyprus
4	Full Primary Business Address (if different from above)	3 Lemesou Avenue, 2112 Nicosia, Cyprus
5	Date of Entity incorporation / establishment	19/3/1960
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Alpha Bank Cyprus is a 100% subsidiary of Alpha Bank SA Greece
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	

	CTE 9 CANCTIONS DECODARAGE	
	, CTF & SANCTIONS PROGRAMME	
	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
	Appointed Officer with sufficient experience / expertise	Yes
	Cash Reporting	Yes
	CDD	Yes
9 d E	EDD	Yes
9 e E	Beneficial Ownership	Yes
9 f	ndependent Testing	Yes
	Periodic Review	Yes
9 h	Policies and Procedures	Yes
9 i F	Risk Assessment	Yes
9 j	Sanctions	Yes
	PEP Screening	Yes
9 I	Adverse Information Screening	Yes
	Suspicious Activity Reporting	Yes
9 n T	Training and Education	Yes
	Transaction Monitoring	Yes
	s the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	No
	equivalent Senior Management Committee?	
	Does the Entity use third parties to carry out any	
		No
	orogramme?	
11a li	f Y, provide further details	
	I BRIBERY & CORRUPTION	
	Has the Entity documented policies and	
	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and	
42	corruption?	
	Does the Entity's internal audit function or other	Yes
	ndependent third party cover ABC Policies and Procedures?	165
	Door the Entity provide mandatory ABC training	
	io:	Yes
	Board and Senior Committee Management	Yes
	1st Line of Defence	Yes
	2nd Line of Defence	Yes
<b>14 d</b> 3	3rd Line of Defence	Yes
<b>14 e</b> 3	3rd parties to which specific compliance	
а	activities subject to ABC risk have been	Yes
	outsourced	
	Non-employed workers as appropriate	Yes
	(contractors / consultants)	100

4 00	N ICIES & PROCEDURES	
<u>4. PO</u> 15	LICIES & PROCEDURES  Has the Entity documented policies and	
15	procedures consistent with applicable AML,	
	CTF & Sanctions regulations and requirements	
	to reasonably prevent, detect and report:	
15 a	Money laundering	Yes
15 b	Terrorist financing	Yes
15 c	Sanctions violations	Yes
16	Does the Entity have policies and procedures	
	that:	
16 a	Prohibit the opening and keeping of anonymous	
10 a	and fictitious named accounts	Yes
16 b	Prohibit the opening and keeping of accounts	Yes
	for unlicensed banks and / or NBFIs	
16 c	Prohibit dealing with other entities that provide	V
	banking services to unlicensed banks	Yes
16 d	Prohibit accounts / relationships with shell	-
	banks	Yes
16 e	Prohibit dealing with another Entity that	
10 6	provides services to shell banks	Yes
	l'	
16 f	Prohibit opening and keeping of accounts for	Yes
	Section 311 designated entities	100
16 g	Prohibit opening and keeping of accounts for	
	any of unlicensed / unregulated remittance	Yes
	agents, exchanges houses, casa de cambio,	165
	bureaux de change or money transfer agents	
16 h	Assess the risks of relationships with PEPs,	
	including their family and close associates	Yes
16 i	Define escalation processes for financial crime	
	risk issues	Yes
16 j	Specify how potentially suspicious activity	l.,
	identified by employees is to be escalated and	Yes
16 k	investigated Outline the processes regarding screening for	
IOK	sanctions, PEPs and negative media	Yes
	sanctions, FEFS and negative media	
17	Has the Entity defined a risk tolerance	
	statement or similar document which defines a	Yes
	risk boundary around their business?	155
18	Does the Entity have a record retention	Yes
	procedures that comply with applicable laws?	
18 a	If Y, what is the retention period?	5 years or more

5. KY	C, CDD and EDD	
19	Does the Entity verify the identity of the	
	customer?	Yes
20	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
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a	Ownership structure	Yes
21 b	Customer identification	
21 c	Expected activity	Yes
21 d	Nature of business / employment	Yes
21 e	Product usage	Yes
21 f	Purpose and nature of relationship	Yes
21 g	Source of funds	Yes
21 h	Source of wealth	Yes
22	Are each of the following identified:	
22 a	Ultimate beneficial ownership	Yes
22 a1	Are ultimate beneficial owners verified?	Yes
22 b	Authorised signatories (where applicable)	Yes
22 c	Key controllers	Yes
22 d	Other relevant parties	
23	Does the due diligence process result in customers receiving a risk classification?	Yes
24	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
25	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
26	Does the Entity have a process to review and update customer information based on:	
26 a	KYC renewal	Yes
26 b	Trigger event	Yes
27	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?	
27 a	Non-account customers Offshore customers	Prohibited
27 b	Onshore customers	EDD on a risk based approach

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27 с	Shell banks	Prohibited
27 d	MVTS/ MSB customers	
27 e	PEPs	EDD on a risk based approach
27 f	PEP Related	EDD on a risk based approach
27 g	PEP Close Associate	EDD on a risk based approach
27 h	Correspondent Banks	EDD on a risk based approach
	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i	Arms, defense, military	Prohibited
27 j	Atomic power	Prohibited
27 k	Extractive industries	EDD on a risk based approach
27 I	Precious metals and stones	EDD on a risk based approach
27 m	Unregulated charities	Prohibited
27 n	Regulated charities	EDD on a risk based approach
27 о	Red light business / Adult entertainment	EDD on a risk based approach
27 p	Non-Government Organisations	EDD on a risk based approach
27 q	Virtual currencies	Prohibited
27 r	Marijuana	Prohibited
27 s	Embassies / Consulates	EDD on a risk based approach
27 t	Gambling	Prohibited
27 u	Payment Service Provider	EDD on a risk based approach
27 v	Other (specify)	
28	If restricted, provide details of the restriction	

0.140	NITORINO & REPORTING	
	NITORING & REPORTING	
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30	What is the method used by the Entity to monitor transactions for suspicious activities?	
30 a	Automated	Yes
30 b	Manual	No
30 с	Combination of automated and manual	No
31	Does the Entity have regulatory requirements to report currency transactions?	Yes
31 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PA	YMENT TRANSPARENCY	
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes
34 b	Local Regulations	Yes
34 b1	Specify the regulation	EU REGULATION 847/2015
34 c	If N, explain	

	NCTIONS	
35	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	Yes
	stripping, or the resubmission and / or masking,	
	of sanctions relevant information in cross border transactions?	
36	Does the Entity screen its customers, including	
	beneficial ownership information collected by the Entity, during onboarding and regularly	Yes
	thereafter against Sanctions Lists?	
37	Select the Sanctions Lists used by the	
	Entity in its sanctions screening processes:	
37 a	Consolidated United Nations Security Council	
0, u	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
37 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
37 c	Office of Financial Sanctions Implementation	
37 6	HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
37 d	European Union Consolidated List (EU)	
3, u	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
37 e	Other (specify)	
38	Does the Entity have a physical presence, e.g.,	
	branches, subsidiaries, or representative offices located in countries / regions against which UN,	
	OFAC, OFSI, EU and G7 member countries	No
	have enacted comprehensive jurisdiction-based	
	Sanctions?	
9. TR	AINING & EDUCATION	
39	Does the Entity provide mandatory training,	
	which includes :	
1		
39 a	Identification and reporting of transactions to	
39 a		Yes
39 a 39 b	Identification and reporting of transactions to government authorities  Examples of different forms of money	Yes
	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions	
	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and	Yes Yes
39 b	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money	Yes
39 b	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions	
39 b	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
39 b 39 c	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions	Yes
39 b 39 c 39 d	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes Yes
39 b 39 c 39 d	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:	Yes Yes
39 b 39 c 39 d 40 40 a	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes Yes
39 b 39 c 39 d 40 40 a 40 b	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes
39 b  39 c  39 d  40  40 a  40 b  40 c	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes Yes Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes Yes Yes No
39 b  39 c  39 d  40  40 a  40 b  40 c	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence	Yes Yes  Yes  No Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced	Yes Yes Yes No Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors /	Yes Yes  Yes  No Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e  40 f	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors / consultants)	Yes  Yes  Yes  No Yes  Yes  No Yes  Yes  Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e  40 f	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors / consultants)	Yes  Yes  Yes  No Yes  Yes  No Yes  Yes  Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors / consultants)	Yes  Yes  Yes  No Yes  Yes  No Yes  Yes  Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e  40 f	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors / consultants)  UDIT  In addition to inspections by the government supervisors / regulators, does the Entity have	Yes  Yes  Yes  No Yes  Yes  No Yes  Yes  Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e  40 f	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors / consultants)  UDIT  In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or	Yes  Yes  Yes  No Yes  Yes  No Yes  Yes  Yes  Yes
39 b  39 c  39 d  40  40 a  40 b  40 c  40 d  40 e  40 f	Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors / consultants)  UDIT  In addition to inspections by the government supervisors / regulators, does the Entity have	Yes  Yes  Yes  No  Yes  Yes  Not Applicable  No