



Financial Institution Name: MCB BANK LIMITED
 Location (Country) : PAKISTAN

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 |
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| 1. ENTITY & OWNERSHIP | | |
| 1 | Full Legal Name | MCB ANK LIMITED |
| 2 | Append a list of foreign branches which are covered by this questionnaire | UAE, SRILANKA,BAHRAIN |
| 3 | Full Legal (Registered) Address | MCB Building,15-Main Gulberg,jail Road,Lahore,Pakistan |
| 4 | Full Primary Business Address (if different from above) | Same as above |
| 5 | Date of Entity incorporation/establishment | 9-Jul-47 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Yes |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | Pakistan Stock Exchange - MCB |
| 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 shares | - |
| 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 | - |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| 10 | Name of primary financial regulator/supervisory authority | STATE BANK OF PAKISTAN (SBP) |
| 11 | Provide Legal Entity Identifier (LEI) if available | 2549002SIFOER1TFOK04 |
| 12 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | N/A |

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| 13 | Jurisdiction of licensing authority and regulator of ultimate parent | N/A |
| 14 | Select the business areas applicable to the Entity | |
| 14 a | Retail Banking | Yes |
| 14 b | Private Banking | Yes |
| 14 c | Commercial Banking | Yes |
| 14 d | Transactional Banking | Yes |
| 14 e | Investment Banking | Yes |
| 14 f | Financial Markets Trading | Yes |
| 14 g | Securities Services/Custody | No |
| 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 |
| 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 | 10001+ |
| 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. PRODUCTS & SERVICES | | |
| 19 | Does the Entity offer the following products and services: | |
| 19 a | Correspondent Banking | Yes |
| 19 a1 | If Y | |
| 19 a1a | Does the Entity offer Correspondent Banking services to domestic banks? | Yes |
| 19 a1b | Does the Entity allow domestic bank clients to provide downstream relationships? | No |
| 19 a1c | Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | Yes |
| 19 a1d | Does the Entity offer Correspondent Banking services to foreign banks? | Yes |
| 19 a1e | Does the Entity allow downstream relationships with foreign banks? | No |
| 19 a1f | Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? | Yes |
| 19 a1g | Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)? | Yes |
| 19 a1h | Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)? | |
| 19 a1h1 | MSBs | No |
| 19 a1h2 | MVTs | No |
| 19 a1h3 | PSPs | No |

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| 19 a1i | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs? | Yes |
| 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 |
| 19 f | International Cash Letter | No |
| 19 g | 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 | No |
| 19 i3 | Virtual Asset Service Providers (VASPs) | No |
| 19 i4 | eCommerce Platforms | No |
| 19 i5 | Other - Please explain | |
| 19 j | Private Banking | No |
| 19 k | Remote Deposit Capture (RDC) | No |
| 19 l | 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: | |
| 19 p1 | Check cashing service | Yes |
| 19 p1a | If yes, state the applicable level of due diligence | Due diligence |
| 19 p2 | Wire transfers | Yes |
| 19 p2a | If yes, state the applicable level of due diligence | Due diligence |
| 19 p3 | Foreign currency conversion | No |
| 19 p3a | If yes, state the applicable level of due diligence | No due diligence (Not required) |
| 19 p4 | Sale of Monetary Instruments | No |
| 19 p4a | If yes, state the applicable level of due diligence | No due diligence (Not required) |
| 19 p5 | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | Yes. Walk-in customer's copy of identity document is obtained, verified through issuing authority and screened through name screening solution before extending any service to them. |
| 19 q | Other high-risk products and services identified by the Entity (please specify) | - |
| 20 | Confirm that all responses provided in the above Section are representative of all the LE's branches. | Yes |
| 20 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | - |
| 21 | If appropriate, provide any additional information/context to the answers in this section. | |
| 3. AML, CTF & SANCTIONS PROGRAMME | | |
| 22 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 22 a | Appointed Officer with sufficient experience/expertise | Yes |
| 22 b | Adverse Information Screening | Yes |
| 22 c | Beneficial Ownership | Yes |
| 22 d | Cash Reporting | Yes |
| 22 e | CDD | Yes |
| 22 f | EDD | Yes |
| 22 g | Independent Testing | Yes |
| 22 h | Periodic Review | Yes |
| 22 i | Policies and Procedures | Yes |
| 22 j | PEP Screening | Yes |
| 22 k | Risk Assessment | Yes |
| 22 l | Sanctions | Yes |

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| 22 m | Suspicious Activity Reporting | Yes |
| 22 n | Training and Education | Yes |
| 22 o | Transaction Monitoring | Yes |
| 23 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 101-500 |
| 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 |
| 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: | Both joint ventures and 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 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Yes |
| 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 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 |
| 40 a | Potential liability created by intermediaries and other third-party providers as appropriate | Yes |

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| 40 b | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| 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 | Not Applicable |
| 42 f | Non-employed workers as appropriate (contractors/consultants) | Not Applicable |
| 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. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
| 46 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 46 a | Money laundering | Yes |
| 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? | Not Applicable |
| 48 b | EU Standards | No |
| 48 b1 | If Y, does the Entity retain a record of the results? | Not Applicable |
| 49 | Does the Entity have policies and procedures that: | |
| 49 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 49 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| 49 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 49 d | Prohibit accounts/relationships with shell banks | 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 foreign PEPs, including their family and close associates | Yes |

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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 l | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Yes |
| 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 |
| 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. | Q48 (a&b): It may be noted that all the regulatory instructions & local laws are aligned with international best practices in general and FATF recommendations in particular. Further, inferring US & EU standards are aligned with FATF recommendations it is confirmed that we are compliant with US & EU standards as well |
| 6. AML, CTF & SANCTIONS RISK ASSESSMENT | | |
| 54 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 54 a | Client | Yes |
| 54 b | Product | Yes |
| 54 c | Channel | Yes |
| 54 d | Geography | Yes |
| 55 | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 55 a | Transaction Monitoring | Yes |
| 55 b | Customer Due Diligence | Yes |
| 55 c | PEP Identification | Yes |
| 55 d | Transaction Screening | Yes |
| 55 e | Name Screening against Adverse Media/Negative News | Yes |
| 55 f | Training and Education | Yes |
| 55 g | Governance | Yes |
| 55 h | Management Information | Yes |
| 56 | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Yes |
| 56 a | If N, provide the date when the last AML & CTF EWRA was completed. | |
| 57 | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| 57 a | Client | Yes |
| 57 b | Product | Yes |
| 57 c | Channel | Yes |
| 57 d | Geography | Yes |
| 58 | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| 58 a | Customer Due Diligence | Yes |
| 58 b | Governance | Yes |
| 58 c | List Management | Yes |
| 58 d | Management Information | Yes |

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| 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 |
| 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: | |
| 65 a | Ultimate beneficial ownership | Yes |
| 65 a1 | Are ultimate beneficial owners verified? | Yes |
| 65 b | Authorised signatories (where applicable) | Yes |
| 65 c | Key controllers | Yes |
| 65 d | Other relevant parties | Yes |
| 66 | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | 20% |
| 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 | Geography | Yes |
| 67 a3 | Business Type/Industry | Yes |
| 67 a4 | Legal Entity type | Yes |
| 67 a5 | Adverse Information | Yes |
| 67 a6 | Other (specify) | Channel / Transnational Activity |
| 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 |
| 68 a2 | KYC renewal | Yes |
| 68 a3 | Trigger event | Yes |
| 68 a4 | Other | Yes |
| 68 a4a | If yes, please specify "Other" | Market Intelligence / Negative Media Search |
| 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: | |
| 69 a1 | Onboarding | Yes |
| 69 a2 | KYC renewal | Yes |