Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

the Wolfsberg Group

Financial Institution Name:

BANK OF INDIA FRANCE Location (Country) : No # Question Answer 1. ENTITY & OWNERSHIP Full Legal name BANK OF INDIA Append a list of foreign branches which are covered by this questionnaire (if applicable) NA Full Legal (Registered) Address 3 4 RUE HALEVY 75009 PARIS Full Primary Business Address (if different from SAME AS ABOVE above) 5 Date of Entity incorporation/establishment 17/05/1974 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 BSE AND NSE 532149 AND BANK OF INDIA INE084A01016 symbol 6 b Member Owned/Mutual No **Y** 6 c Government or State Owned by 25% or more Yes 6 d Privately Owned No 6 d1 If Y, provide details of shareholders or ultimate Bank of India Paris is the french branch of the Bank of India Group which is a nationalised bank and owned by the Government of India by >25%beneficial owners with a holding of 10% or more % of the Entity's total shares composed of bearer Nil shares Does the Entity, or any of its branches, operate under O No an Offshore Banking License (OBL)? 8 a If Y, provide the name of the relevant branch/es Not applicable to Bank of India Paris branch which operate under an OBL Does the Bank have a Virtual Bank License or 9 No provide services only through online channels? 10 Provide Legal Entity Identifier (LEI) if available 213800TTJFBWZSFU7C73 2. AML, CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 11 a Appointed Officer with sufficient experience/expertise Yes 11 b Adverse Information Screening Yes 11 c Beneficial Ownership Yes 11 d Cash Reporting Yes 11 e CDD Yes 11 f EDD Yes 7

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11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11)	PEP Screening	Yes
11 k	Risk Assessment	Yes
111	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
13 a	If Y, provide further details	ka
14	Does the entity have a whistleblower policy?	Yes
	BRIBERY & CORRUPTION	
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
7 a	Board and Senior Committee Management	Yes
7 b	1st Line of Defence	Yes
7 C	2nd Line of Defence	Yes
7 d	3rd Line of Defence	Yes
7 e	Third parties to which specific compliance activities	165
	subject to ABC risk have been outsourced	Not applicable
7 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
. AML, C	CTF & SANCTIONS POLICIES & PROCEDURES	the standard the second standard and standard the second standard standard standards and standard standards and
8	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
8 a	Money laundering	Yes
8 b	Terrorist financing	Yes
Bç	Sanctions violations	Yes
9	Does the Entity have policies and procedures that:	
a	Prohibit the opening and keeping of anonymous	
) b	and fictitious named accounts	Yes
	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
Эc	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
ə d	Prohibit accounts/relationships with shell banks	Yes
)e	Prohibit dealing with another Entity that provides services to shell banks	Yos
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 unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
h	associates	Yes
i	by employees	Yes
J	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes

20	Has the Entity defined a risk tolerance statement o similar document which defines a risk boundary around their business?	r Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
	, CDD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
23	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?	n Yes
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes [
24 c	Nature of business/employment	W
24 d	Ownership structure	Yes
24 e	Product usage	
24 f	Purpose and nature of relationship	
24 g	Source of funds	Yes T
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	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
8	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
9	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
9 a	If yes, select all that apply:	
9 a1	Less than one year	Yes
9 a2	1 – 2 years	Yes
9 a3	3 – 4 years	No
) a4	5 years or more	No
9 a5 9 a6	Trigger-based or perpetual monitoring reviews Other (please specify)	Yes
	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?	
a	Arms, Defence, Military	Do not have this schoop of sustained in the
b	Correspondent Banks	Do not have this category of customer or industry Always subject to EDD
b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
C	Embassies/Consulates	Autority of the second s
d	Extractive industries	EDD on risk-based approach
e		Do not have this category of customer or industry
f	Gambling customers	Prohibited 🜍
		EDD on risk-based approach
g	Marijuana-related Entities	Prohibited
h	MSB/MVTS customers	Do not have this category of customer or industry
i	Non-account customers	Do not have this category of customer or industry
j		
k k	Non-Government Organisations	Always subject to EDD



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30	Music		
30 m	Nuclear power Payment Service Provider	Prohibited	C
30 n	PEPs	Always subject to EDD	
30 0	PEP Close Associates	Always subject to EDD	
30 p	PEP Related	Always subject to EDD	
30 q	Precious metals and stones	Always subject to EDD	
30 r		Do not have this category of customer or industry	
30 s	Red light businesses/Adult entertainment	Prohibited	C
30 t	Regulated charities	Always subject to EDD	V
30 u	Shell banks	Prohibited	C
30 u	Travel and Tour Companies	EDD on risk-based approach	Y
30 W	Unregulated charities	Prohibited	Ø
30 x	Used Car Dealers	Do not have this category of customer or industry	V
30 x 30 y	Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry	0
31	If restricted, provide details of the restriction		
	TORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	-
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Enhanced due diligence controls carried out manually for transactions related to high risk third countries and for significant amounts (three levels defined as per line of buisness (funds transfer, cross border payments etc) All trade Finance operations are subject to due diliger controls pre trade.	hold
34	Does the Entity have regulat ory requirements to report suspicious transactions?	Yes	•
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	-
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
. PAYM	ENT TRANSPARENCY		Longer
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	-
37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:		
7 a	FATF Recommendation 16	Yes	
7 b	Local Regulations	Yes	and a
7 b1	If Y, Specify the regulation	EU regulation 2015-847, US travel rules , India, Singapore (MAS Guid	lance)
7 с	lf N, explain		
. SANCT	IONS		100000
B	Does the Entity have a Sanctions Policy approved by		
	bes 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	0
9	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	0

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40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering trans
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering tran
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering tran
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering trans
41 e 41 f	Lists maintained by other G7 member countries Other (specify)	Used for screening customers and beneficial owners and for filtering trans- French List Bolgian List Indian Ministry List Chinese Ministry List Japan Ministry List
42	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
	ING & EDUCATION	
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
13 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
3 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
3 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
4	Is the above mandatory training provided to :	
4 a 4 b	Board and Senior Committee Management	Yes
4 D 4 C	1st Line of Defence 2nd Line of Defence	Ves 🗘 Yes Ves
4 d	3rd Line of Defence	Yes O
4 e	Third parties to which specific FCC activities have been outsourced	Yes 🔿
4 f	Non-employed workers (contractors/consultants)	Not Applicable
0. AUDIT		
5	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
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ainette ANDO		(Financial Institution name)
	A - Journal (Signature & Da	ance Manager- Second Line representative), certify that I have read and and correct to my honest belief.

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