



Financial Institution Name:
Location (Country) :

BANCA COMERCIALA ROMANA SA
ROMANIA

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	BANCA COMERCIALA ROMANA SA
2	Append a list of foreign branches which are covered by this questionnaire	-
3	Full Legal (Registered) Address	NO 15 D SOS ORHIDEELOR, THE BRIDGE 1 BUILDING, 2ND FLOOR, DISTRICT 6, BUCHAREST, ROMANIA
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	23.01.1991
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	ERSTE GROUP BANK AG - 99.8914%
7	% of the Entity's total shares composed of bearer shares	Not the case
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	NATIONAL BANK OF ROMANIA
11	Provide Legal Entity Identifier (LEI) if available	549300ORLU6LN5YD8X90
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	ERSTE GROUP BANK AG

13	Jurisdiction of licensing authority and regulator of ultimate parent	AUSTRIA, AUSTRIAN FINANCIAL MARKET AUTHORITY (FMA)
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	Yes ☐
14 h	Broker/Dealer	Yes ☒
14 i	Multilateral Development Bank	No ☒
14 j	Wealth Management	Yes ☐
14 k	Other (please explain)	not the case
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.	No branches ☒
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.	Not the case
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 ☐

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Yes	v
19 b	Cross-Border Bulk Cash Delivery	No	v
19 c	Cross-Border Remittances	No	v
19 d	Domestic Bulk Cash Delivery	No	v
19 e	Hold Mail	No	v
19 f	International Cash Letter	No	v
19 g	Low Price Securities	No	v
19 h	Payable Through Accounts	No	v
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No	v
19 i1	If Y , please select all that apply below?		
19 i2	Third Party Payment Service Providers	No	v
19 i3	Virtual Asset Service Providers (VASPs)	No	v
19 i4	eCommerce Platforms	No	v
19 i5	Other - Please explain	Not the case	
19 j	Private Banking	Domestic	v
19 k	Remote Deposit Capture (RDC)	No	v
19 l	Sponsoring Private ATMs	No	v
19 m	Stored Value Instruments	No	v
19 n	Trade Finance	Yes	v
19 o	Virtual Assets	No	v
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	No	v
19 p1a	If yes, state the applicable level of due diligence	No due diligence (Not required)	v
19 p2	Wire transfers	No	v
19 p2a	If yes, state the applicable level of due diligence	No due diligence (Not required)	v
19 p3	Foreign currency conversion	Yes	v
19 p3a	If yes, state the applicable level of due diligence	Due diligence	v
19 p4	Sale of Monetary Instruments	No	v
19 p4a	If yes, state the applicable level of due diligence	No due diligence (Not required)	v
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Not the case	
19 q	Other high-risk products and services identified by the Entity (please specify)	Not the case	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches	v
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.	Not the case	
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	v
22 b	Adverse Information Screening	Yes	v
22 c	Beneficial Ownership	Yes	v
22 d	Cash Reporting	Yes	v
22 e	CDD	Yes	v
22 f	EDD	Yes	v
22 g	Independent Testing	Yes	v
22 h	Periodic Review	Yes	v
22 i	Policies and Procedures	Yes	v
22 j	PEP Screening	Yes	v
22 k	Risk Assessment	Yes	v
22 l	Sanctions	Yes	v

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?	11-100	☐
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	☐
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	☐
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	☐
26 a	If Y, provide further details	BCR outsourced the activity of closing false positive alerts for transaction screening against sanction lists to Erste Opearions GMBH (a company of Erste Group) based on the approval of the National Bank of Romania.	
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	No branches	☐
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.	Not the case	
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 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	☐

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No	v
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	v
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	v
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	v
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	v
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	v
42 b	1st Line of Defence	Yes	v
42 c	2nd Line of Defence	Yes	v
42 d	3rd Line of Defence	Yes	v
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	v
42 f	Non-employed workers as appropriate (contractors/consultants)	No	v
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	v
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	v
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	40 b - BCR is not conducting bussines directly outside Romania 42 e, f - Activity related ABC are not outsourced, legal provision in business contracts related obligations of 3rd parties (vendors/business partners etc)	
45	If appropriate, provide any additional information/context to the answers in this section.	Mandatory ABC contractual provisions were implemented, contractors must comply with BCR rules related ABC available on public website.	
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	v
46 b	Terrorist financing	Yes	v
46 c	Sanctions violations	Yes	v
47	Are the Entity's policies and procedures updated at least annually?	Yes	v
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	v
48 a1	If Y, does the Entity retain a record of the results?	Yes	v
48 b	EU Standards	Yes	v
48 b1	If Y, does the Entity retain a record of the results?	Yes	v
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	v
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	v
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	v
49 d	Prohibit accounts/relationships with shell banks	Yes	v
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	v
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	v
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	v
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	v

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	v
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	v
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	v
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	v
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	v
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	v
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	v
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	v
51 a	If Y, what is the retention period?	5 years or more	v
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	v
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, CTF & SANCTIONS RISK ASSESSMENT			
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	v
54 b	Product	Yes	v
54 c	Channel	Yes	v
54 d	Geography	Yes	v
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	v
55 b	Customer Due Diligence	Yes	v
55 c	PEP Identification	Yes	v
55 d	Transaction Screening	Yes	v
55 e	Name Screening against Adverse Media/Negative News	No	v
55 f	Training and Education	Yes	v
55 g	Governance	Yes	v
55 h	Management Information	Yes	v
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	v
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	v
57 b	Product	Yes	v
57 c	Channel	Yes	v
57 d	Geography	Yes	v
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	v
58 b	Governance	Yes	v
58 c	List Management	Yes	v
58 d	Management Information	Yes	v

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	No branches	☐
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.	Related to question 55 e - kindly note that manual checks are performed against adverse Media/Negative news and relevant information is saved in core banking.	
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?	25%	☐
67	Does the due diligence process result in customers receiving a risk classification?	Yes	☐
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1	Product Usage	Yes	☐
67 a2	Geography	Yes	☐
67 a3	Business Type/Industry	Yes	☐
67 a4	Legal Entity type	Yes	☐
67 a5	Adverse Information	Yes	☐
67 a6	Other (specify)	PEP status, NTF (non face-to-face) onboarding, transactional volume, NPO's etc	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No	☐
68 a	If Y, is this at:		
68 a1	Onboarding	No	☐
68 a2	KYC renewal	No	☐
68 a3	Trigger event	No	☐
68 a4	Other	Yes	☐
68 a4a	If yes, please specify "Other"	In some cases, the business relationship manager may visit the customer on site, but not related to risk associated with the customer (especially for the clients who request a loan facility from the bank).	
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	☐

69 a3	Trigger event	Yes	
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Manual	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Automated	
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	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	
74 a4	5 years or more	Yes	
74 a5	Trigger-based or perpetual monitoring reviews	Yes	
74 a6	Other (Please specify)	Not the case	
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	Always subject to EDD	
76 b	Respondent Banks	EDD on risk-based approach	
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	EDD on risk-based approach	
76 d	Extractive industries	Always subject to EDD	
76 e	Gambling customers	Always subject to EDD	
76 f	General Trading Companies	EDD on risk-based approach	
76 g	Marijuana-related Entities	Prohibited	
76 h	MSB/MVTS customers	Always subject to EDD	
76 i	Non-account customers	Do not have this category of customer or industry	
76 j	Non-Government Organisations	Always subject to EDD	
76 k	Non-resident customers	EDD on risk-based approach	
76 l	Nuclear power	EDD on risk-based approach	
76 m	Payment Service Providers	Always subject to EDD	
76 n	PEPs	Always subject to EDD	
76 o	PEP Close Associates	Always subject to EDD	
76 p	PEP Related	Always subject to EDD	
76 q	Precious metals and stones	Always subject to EDD	
76 r	Red light businesses/Adult entertainment	Always subject to EDD	
76 s	Regulated charities	Always subject to EDD	
76 t	Shell banks	Prohibited	
76 u	Travel and Tour Companies	No EDD/restriction or prohibition	
76 v	Unregulated charities	Prohibited	
76 w	Used Car Dealers	EDD on risk-based approach	
76 x	Virtual Asset Service Providers	Prohibited	
76 y	Other (specify)		
77	If restricted, provide details of the restriction	related to 76 a - only local and state companies involved in arms, defence and military are permitted. Approval for products and transactions is needed.	
78	Does EDD require senior business management and/or compliance approval?	Yes	

78 a	If Y indicate who provides the approval:	Both	
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	
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.	Not the case	
8. MONITORING & REPORTING			
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	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	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Netreveal	
84 b2	When was the tool last updated?	< 1 year	
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year	
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.	Not the case	
9. PAYMENT TRANSPARENCY			
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	

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	
93 c	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 v
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes v
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes v
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches v
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not the case
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCTIONS		
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 v
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 v
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 v
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes v
102	What is the method used by the Entity for sanctions screening?	Automated v
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?	Netreveal/CETS (Compliance enhancement transaction system - a screening/sanction tool used by all Erste Group entities).
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 v
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 v
104	What is the method used by the Entity?	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	v
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	v
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	v
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for filtering transactional data	v
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	v
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	v
106 f	Other (specify)	Not the case	
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	v
107 b	Transactions	Same day to 2 business days	v
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	v
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	v
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.	Not the case	
11. TRAINING & EDUCATION			
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	v
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	v
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	v
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	v
111 e	Conduct and Culture	Yes	v
111 f	Fraud	Yes	v
112	Is the above mandatory training provided to:		
112 a	Board and Senior Committee Management	Yes	v
112 b	1st Line of Defence	Yes	v
112 c	2nd Line of Defence	Yes	v
112 d	3rd Line of Defence	Yes	v
112 e	Third parties to which specific FCC activities have been outsourced	No	v
112 f	Non-employed workers (contractors/consultants)	No	v
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	v
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	v
114 a	If Y, how frequently is training delivered?	Annually	v
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	v

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.	Not the case
12. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes 
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes 
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches 
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.	Not the case
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 
123 e	Name Screening & List Management	Yes 
123 f	Reporting/Metrics & Management Information	Yes 
123 g	Suspicious Activity Filing	Yes 
123 h	Technology	Yes 
123 i	Transaction Monitoring	Yes 
123 j	Transaction Screening including for sanctions	Yes 
123 k	Training & Education	Yes 
123 l	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	No branches 
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	Not the case
14. FRAUD		
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	No branches	
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.	Not the case	

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)

BANCA COMERCIALA ROMANA SA _____ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, VASILE CRISTIAN PASCU _____ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, IOANA ANCA GHEORGHIAD _____ (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.

(Signature & Date)

(Signature & Date)