



Financial Institution Name:
Location (Country):

OTP BANK Plc.
HUNGARY

No	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	OTP Bank Plc. (Nyrt.)
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	H-1051 Budapest, Néder utca (street) 18., HUNGARY
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	09 March 1949
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	Primary exchange: Budapest SE (Symbol: BSE) Ticker: OTP
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	N/A
7	% of the Entity's total shares composed of bearer shares	There are no bearer shares issued.
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	N/A
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	Megyer Nemzeti Bank (MNB, in English: Central Bank of Hungary)
11	Provide Legal Entity Identifier (LEI) if available	529900W3MO00A18X966
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDO)	N/A
13	Jurisdiction of licensing authority and regulator of ultimate parent	The jurisdiction of licensing authority is Hungary. The regulator is Megyer Nemzeti Bank (MNB, in English: Central Bank of Hungary).

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)	N/A
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 Yes, provide the top five countries where the non-resident customers are located.	N/A
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 No, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A

2. PRODUCTS & SERVICES		
19.	Does the Entity offer the following products and services:	
19.a	Correspondent Banking	Yes
19.a1	If Yes	
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	No
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	Yes
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	Yes
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?	Yes
19.i1	If Yes, please select all that apply?	
19.i2	Third Party Payment Service Providers	Yes
19.i3	Virtual Asset Service Providers (VASPs)	No
19.i4	eCommerce Platforms	
19.i5	Other - Please explain	
19.j	Private Banking	Both
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	No
19.p1a	If yes, state the applicable level of due diligence	
19.p2	Wire transfers	Yes
19.p2a	If yes, state the applicable level of due diligence	Identification and Verification
19.p3	Foreign currency conversion	Yes
19.p3a	If yes, state the applicable level of due diligence	Identification and Verification
19.p4	Sale of Monetary Instruments	No
19.p4a	If yes, state the applicable level of due diligence	
19.p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Non-account customers can make payments to existing customer's account. On risk-based approach we apply EDD for these customers. They must prove the source of funds over a certain value limit or on the Bank's request at any time.
19.q	Other high-risk products and services identified by the Entity (please specify)	We do not provide any additional high risk products
20	Confirm that all responses provided in the above Section are representative of all the LFE's branches.	Yes
20.a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
21	If appropriate, provide any additional information/context to the answers in this section.	N/A

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
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 25.	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	N/A
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.	N/A
29	If appropriate, provide any additional information/context to the answers in this section.	N/A

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?
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?
34	Is the Entity's ABC programme applicable to:
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.
35 b	Includes enhanced requirements regarding interaction with public officials?
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)?
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?
39 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?
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:
40 a	Potential liability created by intermediaries and other third-party providers as appropriate
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions
40 e	Changes in business activities that may materially increase the Entity's corruption risk
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?
42	Does the Entity provide mandatory ABC training to:
42 a	Board and senior committee Management
42 b	1st Line of Defence
42 c	2nd Line of Defence
42 d	3rd Line of Defence
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced
42 f	Non-employed workers as appropriate (contractors/consultants)
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?
44	Confirm that all responses provided in the above Section are representative of all the Entity's branches
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.

https://www.wolfsberg-group.info/static/wwwfile/Anti_Corruption_Policy.pdf

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 Yes
48 a1	If Y, does the Entity retain a record of the results? Yes
48 b	EU Standards Yes
48 b1	If Y, does the Entity retain a record of the results? Yes
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
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 question/s the difference/s relate to and the branch/es that this applies to. N/A
53	If appropriate, provide any additional information/context to the answers in this section. N/A

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?	
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
	N/A	
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
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?	
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
	N/A	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches:	
60 a	If N, clarify which questions the difference/s relate to and the branch/ies that this applies to.	
	N/A	
61	If appropriate, provide any additional information/context to the answers in this section.	
	N/A	

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
66 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 Yes, 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)	Delivery Channel
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Yes, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	N/A
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Yes, 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?	Combination of automated and 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 Yes, 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?	Combination of automated and manual
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)	72 a2- 74 a4: low risk: 5 years medium risk: 4 years high risk: 1 year
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 Wolfberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive Industries	EDD on risk-based approach
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	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	Always subject to EDD
76 l	Nuclear power	Always subject to EDD
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	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Always subject to EDD
76 y	Other (specify)	N/A
77	If restricted, provide details of the restriction	Manual, case-by-case assessment and/or additional information and documentation requirements.
78	Does EDD require senior business management and/or compliance approval?	Yes
78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the Entity's branches.	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/ies that this applies to	N/A
82	If appropriate, provide any additional information/context to the answers in this section.	In case of correspondent banking relationships the minimum threshold applied to beneficial ownership identification is 10%.

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?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	All kind of transactions are automatically monitored, manual monitoring is an additional element which focuses on cash transactions and the financial activity of the customer.
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?	Symphony AI
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
86 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 Entity's branches.	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
91	If appropriate, provide any additional information/context to the answers in this section.	N/A
9. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfberg 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	Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing; Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on Information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006
93 c	If N, explain	N/A
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the Entity's branches.	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
97	If appropriate, provide any additional information/context to the answers in this section.	N/A

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?
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)?
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?
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?
102	What is the method used by the Entity for sanctions screening?
102 a	If 'automated' or 'both automated and manual' selected:
102 a1	Are internal system or vendor-sourced tools used? Vendor-sourced tools If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?
	Sanction screening for client database: BAE System (Norkom).
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 detail.
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?
104	What is the method used by the Entity?
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?
106	Select the Sanctions Lists used by the Entity in its screening assessment processes:
106 a	Consolidated United Nations Security Council Sanctions List (UN)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)
106 c	Office of Financial Sanctions Implementation HMT (OFSI)
106 d	European Union Consolidated List (EU)
106 e	Lists maintained by other G7 member countries
106 f	Other (specify)
	Japanese and local sanctions lists.
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, edinet?
107 a	Customer Data
107 b	Transactions
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?
109	Confirm that all responses provided in the above Section are representative of all the Entity's branches.
109 a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.
110	If appropriate, provide any additional information/context to the answers in this section.

11. TRAINING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:
111 a	Identification and reporting of transactions to government authorities
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations
111 e	Conduct and Culture
111 f	Fraud
112	Is the above mandatory training provided to:
112 a	Board and Senior Committee Management
112 b	1st Line of Defence
112 c	2nd Line of Defence
112 d	3rd Line of Defence
112 e	Third parties to which specific FCC activities have been outsourced
112 f	Non-employed workers (contractors/consultants)
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?
114	Does the Entity provide customized training for AML, CTF and Sanctions staff?
114 a	If Y, how frequently is training delivered?
115	Confirm that all responses provided in the above Section are representative of all the LEI's branches
115 a	If N, clarify which questions the difference/s relate to and the branch/ies that this applies to.
116	If appropriate, provide any additional information/context to the answers in this section.

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)?
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?
119	Confirm that all responses provided in the above Section are representative of all the LE's branches
119 a	If N, clarify which questions the difference/s relate to and the branch/ies that this applies to.
120	If appropriate, provide any additional information/context to the answers in this section.
13. AUDIT	
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:
122 a	Internal Audit Department
122 b	External Third Party
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
123 b	Enterprise Wide Risk Assessment
123 c	Governance
123 d	KYC/CDD/EDD and underlying methodologies
123 e	Name Screening & List Management
123 f	Reporting Metrics & Management Information
123 g	Suspicious Activity Filing
123 h	Technology
123 i	Transaction Monitoring
123 j	Transaction Screening including for sanctions
123 k	Training & Education
123 l	Other (specify)
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?
125	Confirm that all responses provided in the above section are representative of all the LE's branches
125 a	If N, clarify which questions the difference/s relate to and the branch/ies that this applies to.
126	If appropriate, provide any additional information/context to the answers in this section.

14. FRAUD	
127	Does the Entity have policies in place addressing fraud risk?
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?
129	Does the Entity have real time monitoring to detect fraud?
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?
131	Confirm that all responses provided in the above section are representative of all the LE's branches
131 a	If N, clarify which question/s relate to and the branch/es that this applies to.
132	If appropriate, provide any additional information/context to the answers in this section.
Declaration Statement	
<p>Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)</p> <p>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)</p> <p>OTP BANK Plc (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.</p> <p>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.</p> <p>The Financial Institution recognizes the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.</p> <p>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.</p> <p>The Financial Institution commits to file accurate supplemental information on a timely basis.</p> <p>I, _____ Veronika TÓTH _____ (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 authorized to execute this declaration on behalf of the Financial Institution.</p> <p>I, _____ Zsófia GÁZMÁR _____ (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 authorized to execute this declaration on behalf of the Financial Institution.</p> <p><i>10.12.2025</i> _____ Veronika Tóth _____ Date <i>24.12.2021</i> _____ Veronika Tóth _____ Head of department (Signature & Date)</p>	