



Financial Institution Name:  
Location (Country) :

Allied Bank Limited  
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
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Allied Bank Limited
2	Append a list of foreign branches which are covered by this questionnaire	All branches of Allied Bank Limited
3	Full Legal (Registered) Address	3 - Tipu Block, Main Boulevard New Garden Town, Lahore - Pakistan.
4	Full Primary Business Address (if different from above)	Same as above
5	Date of Entity incorporation/establishment	3rd December, 1942
6	Select type of ownership and append an ownership chart if available	-
6 a	Publicly Traded (25% of shares publicly traded)	Yes, (Publicly Traded with free float of less than 25%)
6 a1	If Y, indicate the exchange traded on and ticker symbol	Stock Exchange: Pakistan Stock Exchange Limited, Pakistan Ticker Symbol: ABL
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes - Ibrahim Holdings (Private) Limited.
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Mohammad Naeem Mukhtar Sheikh Mukhtar Ahmad Muhammad Waseem Mukhtar  Through Ibrahim Holdings (Private) Limited.
7	% of the Entity's total shares composed of bearer shares	Not Applicable
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	Not Applicable
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	529900X6XIDYH83WGV81
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Ibrahim Holdings (Private) Limited.
13	Jurisdiction of licensing authority and regulator of ultimate parent	Jurisdiction: Pakistan Regulator of Ultimate Parent: Securities and Exchange Commission of Pakistan (SECP).
14	Select the business areas applicable to the Entity	-
14 a	Retail Banking	Yes
14 b	Private Banking	No
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 (Safe Deposit Lockers for Customers Only)
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
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.	Not Applicable
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.	Not Applicable
18	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	-
19 a	Correspondent Banking	Yes
19 a1	If Y	-

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19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Not Applicable
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Not Applicable
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	PKR based Vostro services are provided to licensed and regulated Banks for Inward Home Remittances only; as per regulatory guidelines. (Further, RMA relationships only for SWIFT Correspondence)
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)?	PKR based Vostro services are provided to licensed and regulated Exchange Companies for Inward Home Remittances only; as per regulatory guidelines.
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 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	Not Applicable
19 i3	Virtual Asset Service Providers (VASPs)	Not Applicable
19 i4	eCommerce Platforms	Not Applicable
19 i5	Other - Please explain	Not Applicable
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	Not Applicable
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	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.	ABL offers cash deposit and withdrawal, remittances payment, banking instrument issuance, institutional fee collection and utility bill collection services etc. to walk-in customers. Services to walk in customers are provided in line with regulatory guidelines; subject to performance of Enhance Due Diligence which includes but not limited to Customer identification/ verification, purpose of transaction, name screening, source / ultimate utilization of funds etc., as the case may be. In addition, services/transactions are also weighed against any real time scenarios such as transactions which do not make any economic sense or bears any suspicion etc.
19 q	Other high-risk products and services identified by the Entity (please specify)	No
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.	Not Applicable
21	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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?	Compliance department has 222 staff members of which 90 are dedicated to AML, KYC, CFT and International Correspondence & Remittances Units.
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.	No
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes, Board on quarterly basis while Senior Management on monthly basis.
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	Not Applicable
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.	Not Applicable
29	If appropriate, provide any additional information/context to the answers in this section.	The Bank's Compliance Policy is updated once in three (3) years or as and when required under regulatory requirement. The approving authority of Compliance Policy is Board of the Bank. However, Compliance Plan containing developments, initiatives and regular AML/CFT/CPF activities is approved by the Board on annual basis.
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	ABL as a Commercial Bank mainly deals in services covers ABC risk through Code of Ethics duly approved by the Board of Directors, every employee signs off the same on annual basis. Further, bank has established a separate fraud monitoring & reporting unit for on-going monitoring of staff activities while an independent internal audit function also strengthens this monitoring process. Whistle Blow Policy of the bank also provides mechanism for direct reporting of any suspicious or corrupt behavior to the Audit Committee of the Board.
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Same as above
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	ABL has a limited international presence with a whole sale branch in Bahrain and representative offices in Dubai and Beijing. However, ABL's Bank-wide implemented Code of Ethics are also applicable on these international jurisdictions.
35 b	Includes enhanced requirements regarding interaction with public officials?	Same as above
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)?	Same as above
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:	-
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	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)	Yes
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.	Not Applicable
45	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>5. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>		
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?	The Bank's Compliance Policy is updated once in three (3) years or as and when any regulatory instruction merits the revision of existing policy.
48	Has the Entity chosen to compare its policies and procedures against:	-
48 a	U.S. Standards	Yes, subject to applicability i.e., USA Patriot Act, OFAC sanctions list and sanctions on countries etc.
48 a1	If Y, does the Entity retain a record of the results?	Yes (where necessary)
48 b	EU Standards	Yes, subject to applicability i.e., Restrictive measures imposed on the countries.
48 b1	If Y, does the Entity retain a record of the results?	Yes (where necessary)
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?	Minimum 10 years as per regulatory guidelines.
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.	Not Applicable
53	If appropriate, provide any additional information/context to the answers in this section.	Nil

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.	Not Applicable
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?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	Not Applicable
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.	Not Applicable
61	If appropriate, provide any additional information/context to the answers in this section.	Nil
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	Authorized 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?	For individual (natural person) shareholders holding 20% or above stake (10% or above in case of EDD) in an entity, identification and verification of such natural persons; and for legal persons holding shares equal to 20% or above in an entity, identification and verification of individual (natural person) shareholders holding shares equal to 20% or above of that legal person.
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)	Account type, channel of transaction, anticipated / actual turnover etc.
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

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68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	As & when deemed necessary
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?	Automated
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)	KYC is an on-going process wherein the customer profile is monitored automatically for any change in profile behavior. KYC information is reviewed and updated whenever any change is observed in customer profile including but not limited to source of income, geography, services, residential status, transaction volume etc. or any other change in profile of the customer that merits revision. Further, the periodic review frequency for High-Risk, Medium Risk & Low Risk customers is 01 Year, 03 Years & 05 Years respectively.
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	EDD on risk-based approach
76 b	Respondent Banks	Always subject to EDD
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	Always subject to EDD
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
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 Organizations	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	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Always subject to EDD
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	Prohibited
76 y	Other (specify)	Individuals / entities subject to OFAC / UNSC / sanctions and/or local proscribed individuals / entities involved in predicate crimes are prohibited as per Bank's Policy.  ABL deals with regulated MVTS/ MSB only for inward home remittance transactions under State Bank of Pakistan, Ministry of Overseas Pakistanis and Ministry of Finance joint initiative - Pakistan Remittance Initiative (PRI). Further ABL does not enter into or continue a correspondent banking relationship with a bank incorporated in a jurisdiction, in which it (the correspondent bank) has no physical presence.  ABL only entertains licensed arms, ammunition dealers. Defense, military, atomic power related accounts are opened on production of a special resolution by respective Ministry / Finance Division of the respective department, along with satisfactory performance of EDD measures.
77	If restricted, provide details of the restriction	Not Applicable
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	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not Applicable
82	If appropriate, provide any additional information/context to the answers in this section.	ABL doesn't provide services or transact with Shell Bank, Unregulated Charities, Red Light Business / Adult Entertainment, Virtual Currencies, Marijuana, Gambling, Hawala / Hundi / Other Illegal MVTs, Proscribed / Designated Entities / Industries such as listed under UNSC, OFAC, EU or any business activity prohibited/restricted by the Govt. of Pakistan or any regulatory authority in Pakistan.
<b>8. MONITORING &amp; REPORTING</b>		
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	Not Applicable
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?	Financial Crime and Compliance Management (FCCM)
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	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not Applicable
91	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>9. PAYMENT TRANSPARENCY</b>		
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	AML/CFT/CPF Regulations for State Bank of Pakistan's Regulated Entities (SBP-REs) and AML Act, 2010.
93 c	If N, explain	Not Applicable
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 LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
97	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>10. SANCTIONS</b>		
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
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

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
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
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?	LexisNexis Risk Solutions - Firco Compliance Link
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
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
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
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
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
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Adverse Media Reporting List, Iran Identification and Monitoring Enhancements List, Section 311 List of US Patriot Act List, Bank of England (BoE), Her Majesty's Treasury (HMT), Japanese Sanction Lists i.e., Ministry of Finance (MOF) & Ministry of Economy Trade & Industry (METI), and Local Lists i.e., National Counter Terrorism Authority (NACTA), FIA Red/black books etc.
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	As & when there is an update within any subscribed lists, the same gets updated automatically on real time basis.
107 b	Transactions	As & when there is an update within any subscribed lists, the same gets updated automatically on real time basis.
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
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
110	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	-
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	-
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable



113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customized training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
116	If appropriate, provide any additional information/context to the answers in this section.	Mandatory trainings including AML/CTF/CPF & Fraud awareness etc. are provided to the Bank wide respective staff internally & externally on regular basis. These mandatory trainings are observed by Human Recourse Group of the Bank and conducted at least once a year, with additional trainings as necessary.
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
120	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>13. AUDIT</b>		
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	M/S. EY Ford Rhodes, Chartered Accountants conduct overall audit of the Bank on annual basis. Further, the Regulator i.e., State Bank of Pakistan conducts AML/CTF/CPF & Sanctions program audit on annual basis or as & when deemed necessary by the Regulator.
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	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
126	If appropriate, provide any additional information/context to the answers in this section.	Nil
<b>14. FRAUD</b>		
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	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
132	If appropriate, provide any additional information/context to the answers in this section.	Nil

**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)

Allied Bank Limited 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.

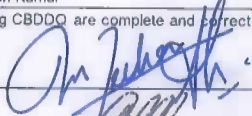
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.


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, Gazi Muhammad Zeeshan Ali (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, Adnan Kamal (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)  
AUG, 2024

 (Signature & Date)  
AUG 2024