

Financial Institution Name: Location (Country):

U.S. Bank N.A.	
United States	

No#	Question	Answer		
1. EN	1. ENTITY & OWNERSHIP			
1	Full Legal name	U.S. Bank National Association		
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	As of January 2025, U.S. Bank N.A. operates approximately 2,200 banking offices in 26 states. U.S. Bank N.A. also operates branches in Toronto, Canada and the Cayman Islands. For more information about our organization, visit www.usbank.com. U.S. Bank Europe, a subsidiary of U.S. Bank, N.A. has its own CBDDQ.		
3	Full Legal (Registered) Address	425 Walnut Cincinnati, OH 45202 USA		
4	Full Primary Business Address (if different from above)	800 Nicollet Mall Minneapolis, MN 55402 USA		
5	Date of Entity incorporation/establishment	July 13, 1863		
6	Select type of ownership and append an ownership chart if available			
6 a 6 a1	Publicly Traded (25% of shares publicly traded)	Yes U.S. Bank National Association is a wholly owned subsidiary of U.S. Pageorp (NVCE: USB)		
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	Not applicable		
7	% of the Entity's total shares composed of bearer shares	0%		
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 Tax ID No: 310-841-368. LEI: 6BYL5QZYBDK8S7L73M02		
10	Provide Legal Entity Identifier (LEI) if available	Charter No. 24 Federal Deposit Insurance Corporation Certificate No. 6548 Federal Reserve Bank ID No. 504713		
2. AN	IL, CTF & SANCTIONS PROGRAMME	Question Answer		
	Does the Entity have a programme that sets minimum			
11	AML, CTF and Sanctions standards regarding the			
	following components:			
11 a	Appointed Officer with sufficient	Yes		
	experience/expertise			
11 b	Adverse Information Screening	Yes		
11 c	Beneficial Ownership	Yes		
11 d	Cash Reporting	Yes		
11 e	CDD	Yes		

11 g. Independent Testing Yes 11 h. Periodic Review Yes 11 p. Periodic Review Yes 11 Risk Assessment Yes 11 Sanctions Yes 11 Sanctions Yes 11 Sanctions Yes 11 Sanctions Yes 11 Training and Education Yes 11 Training and Education Yes 11 Transaction Monitoring Yes 11 Training and Education Yes 11 Sanctions Yes 12 Least annually by the Board or equivalent Senior Yes 13 In Training and Education Yes 14 Dess the Entity salk, CTF & Sanctions programme? 15 Least annually by the Board or equivalent Senior Yes 16 Least annually by the Board or equivalent Senior Yes 17 Least Periodic Yes 18 Least Sanctions of Its AML, CTF & Sanctions programme? 19 Least Review Yes 19 Least Periodic Review Yes 19 Least Periodic Yes 19 Least Periodic Review Yes 20 Least Periodic Review Yes 21 Least Periodic Review Yes 22 Least Periodic Review Yes 23 Least Periodic Review Yes 24 Least Periodic Review Yes 25 Least Periodic Review Yes 26 Least Periodic Review Yes 27 Least Periodic Review Yes 28 Least Periodic Review Yes 29 Least Periodic Review Yes 20 Least Periodic Review Yes 20 Least Periodic Review Yes 20 Least Periodic Review Yes 21 Least Periodic Review Yes 22 Least Periodic Review Yes 25 Least Periodic Review Yes 26 Least Periodic Review Yes 27 Least Periodic Review Yes 28 Least Periodic Review Yes 29 Least Periodic Review Yes 20 Least Periodic Review Yes 20 Least Periodic Review Yes 20 Least Periodic Review Yes 21 Least Periodic Review Yes 22 Least Periodic Review Yes 23 Least Periodic Review Yes 24 Least Periodic Review Yes 25 Least Periodic Review Yes 26 Least Periodic Review	11 f	EDD	Yes
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11   Policies and Procedures   Yes   11   PEP Screening   Yes   11   Risk Assessment   Yes   11   Sanctions   Yes   11   Sanctions   Yes   11   Sanctions   Yes   11   Training and Education   Yes   11   Subscription   Yes   12   least annually by the Board or equivalent Senior   Management Committee?   13   Does the Entity use third parties to carry out any   Components of its AMI, CTF & Sanctions programme?   No   13   If Y, provide further detalis   Training   Yes   14   Does the entity have a whistleblower policy?   Yes   15   ANTI BRIBERY & CORRUPTION   16   As the Entity documented policies and procedures   17   Consistent with applicable ABC regulations and requirements to prevent, detect and report bribery   18   and procedures?   Does the Entity internal audit function or other   19   Indicate   Training   Yes   19   Consistent with applicable ABC regulations and   19   Prohibit the opining and ABC   Procedures   19   Consistent with applicable ABC regulations and   19   Prohibit the opining and keeping of accounts for   19   Prohibit the opining and keeping of accounts for   19   Prohibit dealing with other entities that provide   20   Prohibit dealing with other entities that provide   20   Prohibit dealing with other entities that provide   20   Prohibit dealing with other entities that provide   20			
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17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes  17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced Not Applicable  17 f Non-employed workers as appropriate (contractors/consultants)  4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes 18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit dealing with other entities that provide banking services to unlicensed banks  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks	17		
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Third parties to which specific compliance activities subject to ABC risk have been outsourced  17 f Non-employed workers as appropriate (contractors/consultants)  4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes	17 a	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management	
17 f Non-employed workers as appropriate (contractors/consultants) 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks	17 a 17 b	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence	Yes
subject to ABC risk have been outsourced  17 f Non-employed workers as appropriate (contractors/consultants)  4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes	17 a 17 b 17 c	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes Yes
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes	17 a 17 b 17 c 17 d	Does the Entity provide mandatory ABC training to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence	Yes Yes Yes
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes	17 a 17 b 17 c 17 d	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities	Yes Yes Yes
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes	17 a 17 b 17 c 17 d	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes Yes Yes Not Applicable
consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes	17 a 17 b 17 c 17 d 17 e	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)	Yes Yes Yes Not Applicable Yes
regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering  18 b Terrorist financing  19 c Sanctions violations  19 Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes  Yes	17 a 17 b 17 c 17 d 17 e	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  7L, CTF & SANCTIONS POLICIES & PROCEDURES	Yes Yes Yes Not Applicable Yes
regulations and requirements to reasonably prevent, detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  7L, CTF & SANCTIONS POLICIES & PROCEDURES	Yes Yes Yes Not Applicable Yes
detect and report:  18 a Money laundering Yes  18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures	Yes Yes Yes Not Applicable Yes
18 a Money laundering 18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions	Yes Yes Yes Not Applicable Yes
18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	Yes Yes Yes Not Applicable Yes
18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks	17 a 17 b 17 c 17 d 17 e 17 f 4. AN	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  //L, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Yes Yes Yes Not Applicable Yes Not Question Answer
19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering	Yes Yes Yes Not Applicable Yes Not Question Answer Yes
Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Prohibit dealing with other entities that provide banking services to unlicensed banks	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 a	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing	Yes Yes Yes Not Applicable  Yes  Not Applicable  Yes  Yes
19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 a 18 b	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations	Yes Yes Yes Not Applicable  Yes  Not Question Alswel  Yes  Yes
unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 b 18 c 19	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  //L, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations  Does the Entity have policies and procedures that:	Yes Yes Yes Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Yes  Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 b 18 c 19	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  //L, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and	Yes Yes Yes Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
banking services to unlicensed banks	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 a 18 b 18 c 19	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
banking services to unlicensed banks	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 a 18 b 18 c 19	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  //L, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
19 d Prohibit accounts/relationships with shell banks Yes	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 b 18 c 19 a 19 b	Does the Entity provide mandatory ABC training to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  //L, CTF & SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide	Yes Yes Yes Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y
' '	17 a 17 b 17 c 17 d 17 e 17 f 4. AN 18 a 18 b 18 c 19 19 a 19 b	Does the Entity provide mandatory ABC training to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific compliance activities subject to ABC risk have been outsourced Non-employed workers as appropriate (contractors/consultants)  AL, CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering Terrorist financing Sanctions violations Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes Not Applicable  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Y

19 e	Prohibit dealing with another Entity that provides	Yes
	services to shell banks	
19 f	Prohibit opening and keeping of accounts for Section	Yes
	311 designated entities	
	Prohibit opening and keeping of accounts for any of	
19 g	unlicensed/unregulated remittance agents,	Yes
138	exchanges houses, casa de cambio, bureaux de	100
	change or money transfer agents	
	Assess the risks of relationships with domestic and	
19 h	foreign PEPs, including their family and close	Yes
	associates	
	Define the process for escalating financial crime risk	
19 i	issues/potentially suspicious activity identified by	Yes
	employees	
19 j	Outline the processes regarding screening for	Yes
	sanctions, PEPs and negative media	
	Has the Entity defined a risk tolerance statement or	
20	similar document which defines a risk boundary	Yes
	around their business?	
21	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	
21 a	If Y, what is the retention period?	5 years or more
	C, CDD and EDD	tion Answer
22	Does the Entity verify the identity of the customer?	Yes
	Do the Entity's policies and procedures set out when	
23	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	
24	Which of the following does the Entity gather and	
	retain when conducting CDD? Select all that apply:	v
24 a	Customer identification	Yes
24 b	Expected activity	No Yes
24 c 24 d	Nature of business/employment	Yes
24 u 24 e	Ownership structure	Yes
24 e	Product usage Purpose and nature of relationship	Yes
24 g	Source of funds	No
24 b	Source of wealth	No
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
	Does the due diligence process result in customers	
26	receiving a risk classification?	Yes
	Does the Entity have a risk based approach to	
	- ccc the - hare a hor basea approach to	
27	screening customers and connected parties to	Yes
27		Yes

	5 d 5 m l	T
	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	
28	from screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
	PEPs?	
29	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
<b>29</b> a	If yes, select all that apply:	
29 a1	Less than one year	No
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	No
29 a4	5 years or more	No
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other	High risk customers are reviewed on an annual basis. The identification of a trigger event such as a change in beneficial ownership or the addition of high risk products would require a refresh of KYC information in the interim.
30	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?	
30 a	Arms, Defence, Military	Restricted
30 b	Correspondent Banks	EDD on a risk based approach
	If EDD or EDD & restricted, does the EDD	
	assessment contain the elements as set out in the	
30 b1	Wolfsberg Correspondent Banking Principles	Yes
	2022?	
30 c	Embassies/Consulates	EDD on a risk based approach
30 d	Extractive industries	Restricted
30 e	Gambling customers	EDD on a risk based approach
30 f	General Trading Companies	No EDD/restriction or prohibition
30 g	Marijuana-related Entities	Restricted
30 h	MVTS/ MSB customers	EDD on a risk based approach
30 i	Non-account customers	EDD on a risk based approach
30 j	Non-Government Organisations	EDD on a risk based approach
30 k	Non-resident customers	No EDD/restriction or prohibition
30 I	Nuclear power	No EDD/restriction or prohibition
30 m	Payment Service Provider	EDD on a risk based approach
30 n	PEPs	EDD on a risk based approach
30 o	PEP Close Associates	EDD on a risk based approach
30 p	PEP Related	EDD on a risk based approach
30 q	Precious metals and stones	EDD on a risk based approach
30 r	Red light businesses/Adult entertainment	Restricted
30 s	Regulated charities	EDD on a risk based approach
30 t	Shell banks Travel and Tour Companies	Prohibited  No EDD/restriction or prohibition
30 u	Travel and Tour Companies	No EDD/restriction or prohibition
30 v	Unregulated charities	No EDD/restriction or prohibition
30 w	Used Car Dealers	No EDD/restriction or prohibition
30 x	Virtual Asset Service Providers	Restricted
30 y	Other (specify)	Please contact U.S. Bank for additional information
31	If restricted, provide details of the restriction	Please contact U.S. Bank for additional information
b. IVI	ONITORING & REPORTING	Answer

	Door the Entity have risk based policies, proceedures	
	Does the Entity have risk based policies, procedures	N/
32	and monitoring processes for the identification and	Yes
	reporting of suspicious activity?	
33	What is the method used by the Entity to monitor	Combination of automated and manual
33	transactions for suspicious activities?	Combination of automated and manual
22.5	If manual or combination selected, specify what type	Disconnection C. Dowleton additional information
33 a	of transactions are monitored manually	Please contact U.S. Bank for additional information
	Does the Entity have regulatory requirements to	
34	report suspicious transactions?	Yes
	If Y, does the Entity have policies, procedures and	
34 a	processes to comply with suspicious transactions	Yes
34 a		163
	reporting requirements?	
	Does the Entity have policies, procedures and	
35	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
7. PA	YMENT TRANSPARENCY	Answer
36	Does the Entity adhere to the Wolfsberg Group	Yes
30	Payment Transparency Standards?	166
	Does the Entity have policies, procedures and	
37	processes to comply with and have controls in place to	
	ensure compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, Specify the regulation	Bank Secrecy Act 31 CFR 103.33(g) - "Travel Rule"
37 c	If N, explain	
		Ancwer
	NCTIONS No# Question	Answer
		Answer
	NCTIONS No# Question	Answer
	NCTIONS  Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law	Yes
8. SA	NCTIONS  Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its	Yes
8. SA	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	Yes
8. SA	NCTIONS  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
8. SA	NCTIONS  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?  Does the Entity have policies, procedures or other	Yes
8. SA	NCTIONS  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
8. SA 38	NCTIONS  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?  Does the Entity have policies, procedures or other	
8. SA	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?  Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect	Yes
8. SA 38	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?  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	
8. SA 38	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?  Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions	
8. SA 38	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?  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?	
8. SA 38	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?  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?  Does the Entity screen its customers, including	Yes
8. SA 38	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the	
8. SA 38	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter	Yes
8. SA 38 39	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
8. SA 38	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Select the Sanctions Lists used by the Entity in its	Yes
8. SA 38 39	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:	Yes
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8. SA 38 39 40	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:  Consolidated United Nations Security Council Sanctions List (UN)	Yes  Yes  Used for screening customers and beneficial owners (i.e. reference data)
38 39 40 41 41 a	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:  Consolidated United Nations Security Council Sanctions List (UN)  United States Department of the Treasury's Office of	Yes  Ves  Used for screening customers and beneficial owners (i.e. reference data)  Used for screening customers and beneficial owners and for filtering
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8. SA 38 39 40 41 41 a 41 b	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?  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?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:  Consolidated United Nations Security Council Sanctions List (UN)  United States Department of the Treasury's Office of Foreign Assets Control (OFAC)  Office of Financial Sanctions Implementation HMT	Yes  Ves  Used for screening customers and beneficial owners (i.e. reference data)  Used for screening customers and beneficial owners and for filtering transactional data  Used for screening customers and beneficial owners (i.e. reference
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		Used for screening customers and beneficial owners (i.e. reference	
41 e	Lists maintained by other G7 member countries	data)	
41 f	Other (specify)	Canada, Poland, Lithuania.	
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	
9. TR	AINING & EDUCATION	Answer	
43	Does the Entity provide mandatory training, which includes :		
43 a	Identification and reporting of transactions to government authorities	Yes	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence	Yes	
44 c	2nd Line of Defence	Yes	
44 d	3rd Line of Defence	Yes	
44 e	Third parties to which specific FCC activities have been outsourced	Yes	
44 f	Non-employed workers (contractors/consultants)	Yes	
10. A		Answer	
45	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	
Signat	Signature Page		

Wolfsberg Group Financial Crime Compliance Questionnaire 2022 (FCCQ V1.2)
U.S. Bank National Association
I, John Dunning (Interim BSA Officer), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.
John Dunning 9-22-2025 (Signature & Date)