

## QUESTIONNAIRE FOR EVALUATION OF FINANCIAL INSTITUTIONS (A)

### 1) OWNERSHIP STRUCTURE

- In Table 1 below, list the details of the twenty largest owners ("significant shareholders") of your institution at present, as at the end of the last two fiscal years and any future expected changes, if known, regardless of their amount or percentage held. For financial institutions listed on a principal stock exchange, in a regulated market fulfilling the requirements of disclosure of ownership, such ownership can be limited to the holders of 5% and above of such interests. Please provide information about the extent of each current shareholder's involvement in your institution.

**Table 1 - Ownership Structure**

Shareholder's name	Country of Incorporation	Industry/Activity	Amount Held currently (at __)	Amount Held at 31/12/ __	Amount Held at 31/12/ __
Shareholder 1					
Shareholder 2					
Shareholder X					
<b>Total</b>			<b>100%</b>	<b>100%</b>	<b>100%</b>

- Give details of the identity of the beneficial owner(s)<sup>1</sup> (if any) and of any intervening ownership structure connecting him/her/them with your institution and include any changes in ownership and/or ultimate control over the last 12 months (if a particular shareholder and/or beneficial owner had changed).
- Give details of the identity of these individuals among the significant shareholders, beneficial owner(s), members of the supervisory board, board of directors and key managers who: i) are or have been Politically Exposed Persons (i.e. entrusted with prominent public functions) (PEPs)<sup>2</sup> or ii) are immediate family members<sup>3</sup> of a PEP, or iii) they are known to be close associates<sup>4</sup> of a PEP. Details of identity should also be provided with regards to companies clearly related to such individuals.
- Are there any explicit or implied guarantees from one or more shareholders?

<sup>1</sup> The natural person(s) who ultimately own(s) or control(s) your institution, directly or indirectly.

<sup>2</sup> a) heads of state or of government, b) ministers and deputy or assistant ministers and general secretaries of ministries, c) members of parliaments or similar legislative bodies, d) members of the governing bodies of political parties, e) members of supreme courts, of constitutional courts or of other high-level judicial bodies, f) members of courts of auditors or of the boards of central banks, g) ambassadors, chargés d'affaires and high-ranking officers in the armed forces, h) members of the administrative, management or supervisory bodies of State-owned enterprises, and i) persons who are or who have been entrusted with a prominent function by an international organization, meaning directors, deputy directors and members of the board or equivalent function of an international organization; None of the PEP categories set out above shall be understood as covering middle ranking or more junior officials.

<sup>3</sup> The immediate family members of a PEP shall include: (a) the spouse; (b) any person considered as equivalent to the spouse; (c) the children and their spouses or persons considered as equivalent to the spouse; (d) the parents.

<sup>4</sup> Close associates of a PEP shall include: (a) any natural person who is known to have joint beneficial ownership of legal entities or legal arrangements, or any other close business relations, with the individual holding important public position, (b) any natural person who has sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the benefit de facto of the individual holding important public position.

## 2) **AFFILIATES AND SUBSIDIARIES**

Provide the names of your affiliates<sup>5</sup> and subsidiaries and their countries of registration/operations.

## 3) **MANAGEMENT AND ORGANIZATIONAL STRUCTURE**

1. Provide details (i.e. name, title, experience, etc.) of the supervisory board. List any changes in the last 12 months to the structure of the supervisory board.
2. Provide a brief description of the institution's board of directors, including size, composition and functions. How often does it meet? Provide also a brief resume of each director (one paragraph on each).
3. Provide a brief resume of the institution's key managers, including their banking experience and qualifications (one paragraph on each).
4. What is the organizational structure of your institution? Attach an up-to-date organizational chart.
5. Has there been any management restructuring in the last 12 months? If yes, please describe its nature and include details of any changes that have occurred to the management and management committees of the institution.
6. Are there any forthcoming plans to restructure the organization of your institution? If yes, what are they?
7. What was the number of staff as of the end of the last three fiscal years? What is the current number of staff?

## 4) **FATCA STATUS**

Indicate your institution's FATCA status. If available, provide Global Intermediary Identification Number (GIIN).

## 5) **IN CASE THE PROPOSED OPERATION OR THE OWNERSHIP STRUCTURE OF THE INSTITUTION INVOLVES AN "INTERMEDIATE ENTITY", OR A "CONTROLLING ENTITY", OR SUBSEQUENT "CONTROLLING ENTITIES" ESTABLISHED IN A COUNTRY/COUNTRIES DIFFERENT FROM THE COUNTRY WHERE THE OPERATION OR THE INSTITUTION IS LOCATED (when applicable)**

1. Please outline the key business reasons that led to the selection of the operation's/institution's ownership/control structure for any and all such "intermediate"/"controlling entity/ies"<sup>6</sup>.

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<sup>5</sup> Affiliates means, in relation to an entity (the First Entity), any entity controlled, directly or indirectly, by the First Entity, any entity that controls, directly or indirectly, the First Entity or any entity directly or indirectly under common control with the First Entity.

<sup>6</sup> As per the Bank's Domiciliation of BSDTB's Counterparties Policy:

Ordinarily the Bank lends to, invests in, or guarantees obligations of, a "project entity" established in the country of operations where the operation so financed is located. In some cases, however, the borrower, investee or guaranteed entity will be an "intermediate entity" established in a country of operations different from the country of operations where the operation is located, or in a "third jurisdiction", i.e. a country or territory different from a country of operations.

In addition, a borrower, investee or guaranteed entity, wherever located, may be controlled by an entity or subsequent entities, which "controlling entity/ies" is/are established either in a country of operations or in a third jurisdiction/s. "Control" for this purpose means the power of an entity to govern the financial and operational policies / aspects of the entity of which it is a shareholder.

Key business reasons for the selection of the specific operation's/institution's ownership/control structure, as above, might include (please indicate and elaborate as appropriate):

- (i) the desire to use a jurisdiction to attract capital from multiple sources,
- (ii) the need to consolidate assets across multiple jurisdictions,
- (iii) access to an investment protection treaty,
- (iv) the existence of stable legal systems which facilitate contract enforcement and registration of security,
- (v) the existence of clear laws regarding issues such as governance, liability and taxation,
- (vi) recognition of internationally accepted investment agreements, including shareholder agreements and put options, corporate forms that ensure limited liability of shareholders, and instruments such as preferred shares.
- (vii) any other reason (please outline the reason).

2. If the ownership/control structure of the institution (including use of interposed intermediate/controlling entities) and/or overall arrangements for the operation (including special share rights, tax residences of entities in jurisdictions other than the one in which they are established, or affiliate transactions, such as significant leasing arrangements) eliminate or reduce the occurrence of withholding or other taxes, please explain how that is accomplished (e.g. by allowing access to specific treaties etc).
3. If any intermediate/controlling company(-ies) is/are interposed in the operation's structure or the ownership structure of the institution, please indicate the substance (presence) that **each** such entity has in its established country (offices, business personnel, operational activity). In respect of such entity(-ies), please indicate if any specific tax exemptions, clearances or rulings have been obtained from local authorities relating to the structure, or if it has been party to any significant proceedings in respect of associated tax issues, and the result thereof.

## 6) **a. Know Your Client (KYC) /Anti Money Laundering (AML)/Countering the Financing of Terrorism (CFT) QUESTIONNAIRE**

Attach any policies/procedures in place to detect and prevent money laundering, terrorism financing, fraud, corruption and knowing and accepting the customer and the Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ).

### **b. Sanctions QUESTIONNAIRE**

Please answer the following with a Yes or No. If yes, in the case of question 1, 5, 6 and 7, or No, in the case of questions 2, 3 and 4, please provide a comment inside the respective sections as requested or at the end of the questionnaire.

1. Does the institution or any of its subsidiaries or affiliates or guarantor/s or sponsor/s or shareholders or clients or customers or counterparties or any persons exercising management or control over its affairs: reside, have activities in, trade with, is located in or organized under the laws of, or owned or controlled by the government of or a person located in or organized under the laws of, countries or territories (such as, but not limited to, Myanmar (Burma), Cuba, Iran, Syria, North Korea, Crimea, Sudan, or the non-government controlled areas of Ukraine in the oblasts of Donetsk, Kherson, Luhansk and Zaporizhzhia)	YES <input type="checkbox"/>	NO <input type="checkbox"/>
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appearing on any UN, EU, OFAC, UK or Swiss State Secretariat for Economic Affairs (SECO) sanctions list?		
2. Is your institution assessing the integrity of its customers and their relevant legal entities and natural persons, including checking against blacklists of any type e.g. of natural persons, legal entities and countries, during on boarding and regularly thereafter?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
3. Does your institution have written policies prohibiting transactions: a) with persons and entities appearing on any UN, EU, OFAC, SECO or UK blacklist, b) which contravene any applicable laws or international conventions in all relevant jurisdictions?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
4. 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 <input type="checkbox"/>	NO <input type="checkbox"/>
5. Does your institution have any ongoing direct or indirect exposure to Russia / Belarus / Ukraine? If yes, please advise on total revenue, including as a percentage, derived from Russia / Belarus / Ukraine  _____ _____ _____  If exposure to Ukraine, do you have exposure to Crimea, or the non-government controlled areas of Ukraine in the oblasts of Donetsk, Kherson, Luhansk and Zaporizhzhia regions?	YES <input type="checkbox"/>     YES <input type="checkbox"/>	NO <input type="checkbox"/>     NO <input type="checkbox"/>
6. Does your institution have any exposure to specifically US/UK/EU Sanctioned entities/individuals in Russia or Belarus?  If so, please indicate i. Name of the relevant sanctioned party ii. Type of business relationship iii. Amounts involved iv. Impact to your operations v. Measures in place/expected to mitigate the impact vi. Legal or other advice obtained/sought on possible exposure (Y/N) and name of advice provider vii. Actions being taken to check exposure of the FI's customers  _____ _____ _____	YES <input type="checkbox"/>	NO <input type="checkbox"/>
7. Does your institution receive any direct or indirect funding/credit lines from the sanctioned persons, legal entities or their local subsidiaries?	YES <input type="checkbox"/>	NO <input type="checkbox"/>

## PREVENTION OF MARKET ABUSE (FOR LISTED ENTITIES ONLY)

Are you providing herein any Inside Information<sup>7</sup> to BSTDB?

If yes, what is the Inside Information?

I hereby commit to explicitly flagging to BSTDB as Inside Information any such information provided to BSTDB throughout the duration of the business relationship.

## PERSONAL DATA PROTECTION

All the personal data provided herein shall be processed by BSTDB for the purpose of performing its KYC due diligence. BSTDB is committed to the protection of personal data in accordance with its Policy on Personal Data Protection <https://www.bstdb.org/transparency/public-documents>. In case you have a query or concern regarding the protection of your personal data held by BSTDB, please contact BSTDB's Data Protection Officer <https://www.bstdb.org/privacy>.

Space for additional information

(Please indicate which question the information is referring to)

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<sup>7</sup> As per BSTDB's Policy on the Prevention of Market Abuse, "**Inside Information**" is defined as:

information, relating to: (a) BSTDB in its capacity as an Issuer; or (b) a (potential) client of BSTDB whose Financial Instruments are listed; or (c) an Issuer or Financial Instrument with which the Bank is dealing or is interested in:

- i. of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more Financial Instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those Financial Instruments or on the price of related derivative Financial Instruments;
- ii. in relation to commodity derivatives, information of a precise nature, which has not been made public, relating, directly or indirectly to one or more such derivatives or relating directly to the related spot commodity contract, if it were made public, would be likely to have a significant effect on the prices of such derivatives or related spot commodity contracts, and where this is information which is reasonably expected to be disclosed or is required to be disclosed;
- iii. in relation to emission allowances or auctioned products based thereon, information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more such instruments, and which, if it were made public, would be likely to have a significant effect on the prices of such instruments or on the prices of related derivative Financial Instruments;
- iv. for persons charged with the execution of orders concerning Financial Instruments, it also means information conveyed by a client and relating to the client's pending orders in Financial Instruments, which is of a precise nature, relating, directly or indirectly, to one or more issuers or to one or more Financial Instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those Financial Instruments, the price of related spot commodity contracts, or on the price of related derivative Financial Instruments.

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Date:

Signature:

Name of the officer responsible for the completion of the Questionnaire: