

**the
Wolfsberg
Group**

Financial Institution Name:

OJSC BANK ESKHATA

Location (Country) :

TAJKISTAN

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

| No # | Question | Answer |
|----------------------------------|---|---|
| 1. ENTITY & OWNERSHIP | | |
| 1 | Full Legal Name | Open Joint Stock Company "Bank Eshkata" |
| 2 | Append a list of foreign branches which are covered by this questionnaire | There are no foreign branches |
| 3 | Full Legal (Registered) Address | 735700, Republic of Tajikistan, Khujand, Gagarin Str. 135 |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/ establishment | November 29, 1994 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | No |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | |
| 6 b | Member Owned/ Mutual | Yes |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | Yes |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | Nasirov Ayubjon - 26,64% Nasirov Khurshed - 23,88% Nasirov Dilovar - 10,06% |
| 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 | Name of primary financial regulator / supervisory authority | National Bank of Tajikistan |

| | | |
|------|--|---------------------------------|
| 10 | Provide Legal Entity Identifier (LEI) if available | 5110001371 |
| 11 | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |
| 12 | Jurisdiction of licensing authority and regulator of ultimate parent | Tajikistan |
| 13 | Select the business areas applicable to the Entity | |
| 13 a | Retail Banking | Yes |
| 13 b | Private Banking / Wealth Management | Yes |
| 13 c | Commercial Banking | Yes |
| 13 d | Transactional Banking | Yes |
| 13 e | Investment Banking | No |
| 13 f | Financial Markets Trading | Yes |
| 13 g | Securities Services / Custody | Yes |
| 13 h | Broker / Dealer | No |
| 13 i | Multilateral Development Bank | No |
| 13 j | Other | |
| 14 | 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 |
| 14 a | If Y, provide the top five countries where the non-resident customers are located. | |
| 15 | Select the closest value: | |
| 15 a | Number of employees | 1001-5000 |
| 15 b | Total Assets | Between \$100 and \$500 million |
| 16 | Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches | Yes |
| 16 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 16 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 2. PRODUCTS & SERVICES | | |
|------------------------|--|-----|
| 17 | Does the Entity offer the following products and services: | |
| 17 a | Correspondent Banking | Yes |
| 17 a1 | If Y | |
| 17 a2 | Does the Entity offer Correspondent Banking services to domestic banks? | Yes |
| 17 a3 | Does the Entity allow domestic bank clients to provide downstream relationships? | No |
| 17 a4 | Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | Yes |
| 17 a5 | Does the Entity offer correspondent banking services to Foreign Banks? | Yes |
| 17 a6 | Does the Entity allow downstream relationships with Foreign Banks? | Yes |
| 17 a7 | Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks? | Yes |
| 17 a8 | Does the Entity offer correspondent banking services to regulated MSBs/MVTS? | Yes |
| 17 a9 | Does the Entity allow downstream relationships with MSBs/MVTS? | Yes |
| 17 a10 | Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS? | Yes |
| 17 b | Private Banking (domestic & international) | Yes |
| 17 c | Trade Finance | Yes |
| 17 d | Payable Through Accounts | No |
| 17 e | Stored Value Instruments | Yes |
| 17 f | Cross Border Bulk Cash Delivery | No |
| 17 g | Domestic Bulk Cash Delivery | Yes |
| 17 h | International Cash Letter | No |
| 17 i | Remote Deposit Capture | No |
| 17 j | Virtual /Digital Currencies | No |
| 17 k | Low Price Securities | Yes |
| 17 l | Hold Mail | No |
| 17 m | Cross Border Remittances | Yes |
| 17 n | Service to walk-in customers (non-account holders) | Yes |
| 17 o | Sponsoring Private ATMs | No |
| 17 p | Other high risk products and services identified by the Entity | |
| 18 | Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches | Yes |
| 18 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 18 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 3. AML, CTF & SANCTIONS PROGRAMME | | |
|-----------------------------------|---|------------------------------|
| 19 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 19 a | Appointed Officer with sufficient experience/expertise | Yes |
| 19 b | Cash Reporting | Yes |
| 19 c | CDD | Yes |
| 19 d | EDD | Yes |
| 19 e | Beneficial Ownership | Yes |
| 19 f | Independent Testing | Yes |
| 19 g | Periodic Review | Yes |
| 19 h | Policies and Procedures | Yes |
| 19 i | Risk Assessment | Yes |
| 19 j | Sanctions | Yes |
| 19 k | PEP Screening | Yes |
| 19 l | Adverse Information Screening | Yes |
| 19 m | Suspicious Activity Reporting | Yes |
| 19 n | Training and Education | Yes |
| 19 o | Transaction Monitoring | Yes |
| 20 | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 10-50 |
| 21 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes |
| 22 | Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme? | Quarterly/Every three months |
| 23 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | No |
| 23 a | If Y, provide further details. | |
| 24 | Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches | Yes |
| 24 a | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| 24 b | If appropriate, provide any additional information / context to the answers in this section. | |

| 4. ANTI BRIBERY & CORRUPTION | | |
|------------------------------|--|----------------|
| 25 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | Yes |
| 26 | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Yes |
| 27 | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Yes |
| 28 | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Yes |
| 29 | Is the Entity's ABC programme applicable to: | Joint ventures |
| 30 | Does the Entity have a global ABC policy that: | |
| 30 a | Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage | Yes |
| 30 b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 30 c | Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)? | Yes |
| 31 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 32 | Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters? | Yes |
| 33 | Does the Entity perform an Enterprise Wide ABC risk assessment? | Yes |
| 33 a | If Y select the frequency | 12 Months |
| 34 | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Yes |
| 35 | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| 35 a | Potential liability created by intermediaries and other third-party providers as appropriate | Yes |
| 35 b | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| 35 c | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials | Yes |
| 35 d | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Yes |
| 35 e | Changes in business activities that may materially increase the Entity's corruption risk | No |
| 36 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |

