### the Wolfsberg Group

Tinonoial	Institution	Mana

CHINA CONSTRUCTION BANK NEW YORK BRANCH

Location (Country):

the United States

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No#	Question	Answer
1. EN	TITY & OWNERSHIP	
1	Full Legal Name	
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2	Append a list of branches which are covered by	China Construction Bank New York Branch
ľ	this questionnaire	
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		New York Branch
3	Full Legal (Registered) Address	
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		\$2500W \$250 W 10 10 10 10 10 10 10 10 10 10 10 10 10
4	Full Primary Business Address (if different from	1095 Avenue of the Americas FL 33, New York
*	above)	
5	Date of Entity incorporation/ establishment	
6	Select type of ownership and append an	Feb 18, 2009
Ľ	ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
0.4	If V !-d!d- thhd-dd-ti-l	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	
		0939.HK
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d 6 d1	Privately Owned  If Y, provide details of shareholders or ultimate	No
0 01	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of	
	bearer shares	
		45
8	Does the Entity, or any of its branches, operate	None
ľ	under an Offshore Banking License (OBL) ?	5
		No
а	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory	
	authority	
		New York State Department of Financial Services
L		Federal Reserve Bank of New York

10	Provide Legal Entity Identifier (LEI) if available	
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11	Provide the full legal name of the ultimate parent	
1	(if different from the Entity completing the DDQ)	
l		
		China Construction Bank Corporation
12	Jurisdiction of licensing authority and regulator	
	of ultimate parent	
		China/China Banking Regulatory Commission
13	Select the business areas applicable to the	
	Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	No
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	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	
		No
13 j	Other	
14	Does the Entity have a significant (10% or more)	
14	offshore customer base, either by number of	
	customers or by revenues (where off-shore	
1	means not domiciled in the jurisdiction where	
	bank services are being provided)?	
		Yes
14 a	If Y, provide details of the country and %	
l		
		Laboration in the second secon
		China and >50%
15	Select the closest value:	
15 a	Number of employees	51-200
15 b	Total Assets	Greater than \$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	153
10 a	relate to and the branch/es that this applies to.	
	relate to and the branchies that this applies to.	
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16 b	If appropriate, provide any additional information	
1,00	/ context to the answers in this section.	
I	Context to the answers in this section.	
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2. PRO	DDUCTS & SERVICES	
17	Does the Entity offer the following products and	
17	services:	
17 a	Correspondent Banking	Yes
	If Y	
	Does the Entity offer Correspondent Banking	
	services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to	
11 40	provide downstream relationships?	Yes
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?	No
17 a9	Does the Entity allow downstream relationships	
	with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures	
	in place to identify downstream relationships	
	with MSB /MVTS?	No
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	No
	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account	
	holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified	
"	by the Entity	
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18	Confirm that all responses provided in the above	
	Section PRODUCTS & SERVICES are	M and
40	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.	
		China Construction Bank New York Branch does not have any branches.

3. AM	L, 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 I	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?	Yes
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	
7.5	Section AML, CTF & SANCTIONS Programme	
	are representative of all the LE's branches	
	1	
	IFN 1 17 111 11 117	Yes
24 a	If N, clarify which questions the difference/s	
l	relate to and the branch/es that this applies to.	
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24 b	If appropriate, provide any additional information	
_ , ,	/ context to the answers in this section.	
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_		China Construction Bank New York Branch does not have any branches.

4 AN	TI 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?	
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes 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:	
29 a	Joint ventures	Yes
29 b	Third parties acting on behalf of the Entity	Yes
30	Does the Entity have a global ABC policy that:	165
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
		1,00

125	Dans the Entitude ABC EMBA and the inhance	
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	No
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	No
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
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
37 f	Non-employed workers as appropriate (contractors/consultants)	Tes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.

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or similar document which defines a risk boundary around their business?  45 Does the Entity have a record retention procedures that comply with applicable laws?  45 a If Y, what is the retention period?  46 Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	44	Has the Entity defined a risk tolerance statement	
boundary around their business?  Yes  Does the Entity have a record retention procedures that comply with applicable laws?  Yes  If Y, what is the retention period?  Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this section.	155		
Does the Entity have a record retention procedures that comply with applicable laws?  45 a If Y, what is the retention period?  46 Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	l		
procedures that comply with applicable laws?  Yes  If Y, what is the retention period?  Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this section.			Yes
45 a If Y, what is the retention period?  46 Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	45		
45 a If Y, what is the retention period?  5 years or more  Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  Yes  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this section.		procedures that comply with applicable laws?	Vac
5 years or more  Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	1E -	If V what is the retention period?	100
Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches  46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	+3 a	in i, what is the retention period?	5 years or more
Section POLICIES & PROCEDURES are representative of all the LE's branches  Yes  46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	46	Confirm that all responses provided in the above	a pana ai mala
representative of all the LE's branches  Yes  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this section.	I <sup>+0</sup>		
46 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b If appropriate, provide any additional information / context to the answers in this section.	l		
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  46 b  If appropriate, provide any additional information / context to the answers in this section.	1	representative of all the LES branches	Yes
relate to and the branch/es that this applies to.  46 b  If appropriate, provide any additional information / context to the answers in this section.	46 a	If N, clarify which questions the difference/s	
46 b If appropriate, provide any additional information / context to the answers in this section.	- vesus (50)		
/ context to the answers in this section.	1		
/ context to the answers in this section.	l		
/ context to the answers in this section.			
	46 b		
China Construction Bank New York Branch does not have any branches.		/ context to the answers in this section.	
China Construction Bank New York Branch does not have any branches.	l		
Crima Construction Bank New York Branch does not have any branches.	I		China Canata stice Book New York Barach days not be
	L	<u> </u>	China Construction bank New York branch does not have any branches.

6. AM	L, CTF & SANCTIONS RISK ASSESSME	NT .
47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	165
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	Yes
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Tes
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	Yes
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
53 b	If appropriate, provide any additional information / context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.

7. KY	C, CDD and EDD	
54	Does the Entity verify the identity of the	
	customer?	
		Yes
55	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
56	Which of the following does the Entity gather	
	and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	Yes
57 a	Ultimate beneficial ownership	
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Particular (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994) 1 (1994)	Yes
	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
		Yes, such as business partners, guarantors.
58	What is the Entity's minimum (lowest) threshold	Tool book to book book to be a facility of the second of t
	applied to beneficial ownership identification?	
		10%
59	Does the due diligence process result in	
	customers receiving a risk classification?	
		Yes
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that	
	apply:	
60 a	Product Usage	
60 b	Geography	Yes
	3: 4: 5	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	
63 b	Manual	
63 c	Combination of automated and manual	Yes
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	
66 b	Manual	
66 c	Combination of automated and manual	Yes
67	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?	
68	Does the Entity have a process to review and update customer information based on:	Yes
68 a	KYC renewal	Yes
68 b	Trigger event	
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes Yes

70	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?	
70 a	Non-account customers	Prohibited
70 b	Offshore customers	Prohibited
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	po 1990/or at
70 e	PEPs	Prohibited FDR on with board access to
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	EDD on a risk based approach
	30 20	Yes
70 i	Arms, defense, military	EDD on a risk based approach
70 j	Atomic power	EDD on a risk based approach
70 k	Extractive industries	EDD on a risk based approach
70 I	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	During EDD procedure, if CCBNY does not feel comfortable with it, the customer will not be onboarded.
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Von
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Yes
73 b	If appropriate, provide any additional information / context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.

8. MO	NITORING & REPORTING	
	Does the Entity have risk based policies,	
	procedures and monitoring processes for the	
	identification and reporting of suspicious	
	activity?	Yes
75	What is the method used by the Entity to monitor	
	transactions for suspicious activities?	
75 a	Automated	
75 b	Manual	
	the designation of the value of	
75 c	Combination of automated and manual	Yes
76	If manual or combination selected, specify what	
	type of transactions are monitored manually	All the transactions happened in CCBNY will be monitored automatedly first, then alerts will be generated and
		analized mannually. CCBNY might also conduct mannual mornitoring according to negtive news report or
		regulatory requirements.
77	Does the Entity have regulatory requirements to	
	report currency transactions?	
77.0	If Y, does the Entity have policies, procedures	Yes
77 a	and processes to comply with currency reporting	
	requirements?	
		Yes
78	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from the monitoring of customer	
	transactions and activity?	
		Yes
79	Confirm that all responses provided in the above	
	Section MONITORING & REPORTING are	
	representative of all the LE's branches	
		Van
79 a	If N, clarify which questions the difference/s	Yes
,,,,	relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.
9. PA	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and	
	processes to [reasonably] comply with and have	
	controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	V
81 b	Local Regulations	Yes
		Yes
81 b1	Specify the regulation	
		as Shake adapted the same and t
04.5	If N. ovoloin	Bank Secrecy ACT/USA PATRIOT Act
81 c	If N, explain	
82	Does the Entity have processes in place to	
02	respond to Request For Information (RFIs) from	
	other entities in a timely manner?	
02	Dogs the Entity have sentrals to the sentral state of the	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator	
	information in international payment messages?	
	F-1,	
		Yes

84	Does the Entity have controls to support the	
35.522	inclusion of required beneficiary in international	
	payment messages?	
	payment messages.	
		Yes
85	Confirm that all responses provided in the above	
00	Section PAYMENT TRANSPARENCY are	
	representative of all the LE's branches	
	representative of all the LL's branches	
		Yes
85 a	If N, clarify which questions the difference/s	
00 0	relate to and the branch/es that this applies to.	
	relate to and the branchives that this applies to.	
85 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.
10. S	ANCTIONS	
86	Does the Entity have a Sanctions Policy	
15.70	approved by management regarding compliance	
	with sanctions law applicable to the Entity,	
i	including with respect its business conducted	
l	with, or through accounts held at foreign	
l	financial institutions?	
	The state of the s	
		Yes
87	Does the Entity have policies, procedures, or	
	other controls reasonably designed to prevent	
l	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	
l	entity's local jurisdiction)?	
	entity's local jurisdiction)?	
		Yes
88	Does the Entity have policies, procedures or	
l	other controls reasonably designed to prohibit	
l	and/or detect actions taken to evade applicable	
l	sanctions prohibitions, such as stripping, or the	
l	resubmission and/or masking, of sanctions	
l	relevant information in cross border	
	transactions?	
		Yes
89	Does the Entity screen its customers, including	
00	beneficial ownership information collected by the	
	Entity, during onboarding and regularly	
l	thereafter against Sanctions Lists?	
l	therealter against Sanctions Lists?	
		Yes
90	What is the method used by the Entity?	
90 a	Manual	
90 b	Automated	
90 c	Combination of Automated and Manual	Yes
91	Does the Entity screen all sanctions relevant	
ارا	data, including at a minimum, entity and location	
I	information, contained in cross border	
1	transactions against Sanctions Lists?	
l	Transactions against Sanctions Lists?	V
00	What is the mathed want to the Feb. 0	Yes
92	What is the method used by the Entity?	
92 a	Manual	
92 b	Automated	
92 c	Combination of Automated and Manual	Yes
93	Select the Sanctions Lists used by the Entity in	
l	its sanctions screening processes:	
1		
02	Consolidated Haited Nations County Co. "	
93 a	Consolidated United Nations Security Council	
l	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 b	United States Department of the Treasury's	base for soreoning customers and beneficial owners and for filtering transactional data
ا دو		
1	Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
93 с	Office of Financial Sanctions Implementation	V.
	HMT (OFSI)	
	a programme the real region.	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	
02 -	Liete maintained by other O7	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	
1		
		I

93 f	Other (specify)	
		HKMA and Internal Watch List.
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	
	days before the Entity updates its lists:	Same day to 2 days
95	When updates or additions to the Sanctions	
	Lists are made, how many business days before the Entity updates their active manual and/or	
	automated screening systems against:	
95 a	Customer Data	
05.6	Tti	Same day to 2 days
95 b	Transactions	
96	Does the Entity have a physical presence, e.g.,	Same day to 2 days
30	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
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all	
	the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	relate to and the branchives that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
	/ context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.
11. T	RAINING & EDUCATION	China Construction Bank New York Branch does not have any branches.
11. T 98	AINING & EDUCATION  Does the Entity provide mandatory training, which includes:	China Construction Bank New York Branch does not have any branches.
98	Does the Entity provide mandatory training, which includes :	China Construction Bank New York Branch does not have any branches.
	Does the Entity provide mandatory training,	
98 98 a	Does the Entity provide mandatory training, which includes :  Identification and reporting of transactions to government authorities	China Construction Bank New York Branch does not have any branches.  Yes
98	Does the Entity provide mandatory training, which includes :  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions	
98 98 a	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and	
98 98 a	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
98 98 a	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money	Yes
98 a 98 b	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 a 98 b 98 c	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 a 98 b	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions	Yes
98 a 98 b 98 c	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 a 98 b 98 c 98 c	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture	Yes Yes
98 a 98 b 98 c 98 d 98 e 99	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:	Yes Yes Yes
98 a 98 b 98 c 98 c 99 99 a	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes Yes Yes
98 a 98 b 98 c 98 c 99 99 a 99 b	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes Yes Yes Yes
98 a 2 98 b 98 c 99 c 99 b 99 c	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes Yes Yes Yes Yes Yes Yes
98 a 98 b 98 c 98 d 99 99 a 99 c 99 d	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes
98 a 2 98 b 98 c 99 c 99 b 99 c	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes
98 a 98 b 98 c 98 c 98 e 99 99 a 99 b 99 c 99 d	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence	Yes
98 a 98 a 98 b 98 c 98 c 98 e 99 99 a 99 b 99 c 99 d 99 e	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced	Yes
98 a 98 a 98 b 98 c 98 c 98 e 99 99 a 99 b 99 c 99 d 99 e	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  3rd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)	Yes
98 a 98 b 98 c 99 g a 99 b 99 c 99 d 99 f	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  3rd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles,	Yes
98 a  98 b  98 c  98 c  98 e  99 a  99 b  99 c  99 d  99 e	Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  Internal policies for controlling money laundering, terrorist financing and sanctions violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  3rd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)	Yes

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	
		Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	China Construction Bank New York Branch does not have any branches.
12 OI	JALITY ASSURANCE /COMPLIANCE TE	
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	
		Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	
		Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	
		China Construction Bank New York Branch does not have any branches.
13. AL		
106	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 and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	·
L		Yearly

108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	
108 b	KYC / CDD / EDD and underlying methodologies	Yes Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 I	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	-
Versally.		China Construction Bank New York Branch does not have any branches.

Page 17

#### Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2) 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) CHINA CONSTRUCTION BANK NEW YORK BRAN (Bank name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. CHINA CONSTRUCTION BANK NEW YORK BRAN (Bank name) 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. CHINA CONSTRUCTION BANK NEW YORK BRAN (Bank name)recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. CHINA CONSTRUCTION BANK NEW YORK BRAN (Bank name) 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 on an annual basis. CHINA CONSTRUCTION BANK NEW YORK BRAN (Bank name) commits to file accurate supplemental information on a timely basis. Mildred L. Harper (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 (Bank name) Mildred L. Harper (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 (Bank name)

(Signature & Date (DD/MM/YYYY))

(Signature & Date (DD/MM/YYYY))