

Financial Institution Name: Location (Country):

China Construction Bank - New York Branch
United States of America

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 #	ase etc.) is materially different than its Entity Head Office, a separate qu Question	Answer
_	& OWNERSHIP	Allower
1	Full Legal Name	
•	Tuli Legal Name	
		China Construction Bank Corporation (New York Branch)
2	Append a list of foreign branches which are covered by	
2	this questionnaire	
	ins questionnaire	None
3	Full Legal (Degistered) Address	
3	Full Legal (Registered) Address	
		1095 Avenue of Americas, 33rd Floor, New York, New York 10036
	E II Disease Desistant Address ('Cal'Renest Constants)	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
		18-Feb-09
6	Select type of ownership and append an ownership	
	chart if available	
<u>6 a</u>	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	0939.HK / Shanghai: 601939
		occon int / Changhail co reco
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
		None
8	Does the Entity, or any of its branches, operate under	No
0.0	an Offshore Banking License (OBL)?	
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	no
10	services only through online channels?  Name of primary financial regulator/supervisory authority	
. •	Trains of primary interioral regulator/supervisory authority	Federal Reserve Bank of New York
		New York State Department of Financial Services
11	Provide Legal Entity Identifier (LEI) if evallable	
• • • • • • • • • • • • • • • • • • • •	Provide Legal Entity Identifier (LEI) if available	
		LEI: 5493001KQW6DM7KEDR62
40	Drawing the full level or as of the 100 of 1	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	CHINA CONSTRUCTION BANK CORPORATION
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	China / China Banking and Insurance Regulatory Commission
		James James Barnaria and modification regulatory Commission
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Yes

<u>14 d</u>	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where	Yes
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	China >50%
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	No branches
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Information provided solely on the behalf of the New York Branch of China Construction Bank
18	If appropriate, provide any additional information/context to the answers in this section.	The New York Branch of China Construction Bank, is a foreign branch of China Construction Bank Corporation, headquartered in Beijng China. All answers provided in the following sections, reflect information submitted on behalf of the New York Branch of China Construction Bank.
2 BBOBI	ICTO 9 CEDVICES	
	JCTS & SERVICES	
19	Does the Entity offer the following products and services:	
<u>19 a</u>	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
19 a1g	foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
40 41 1		No
<u>19 a1h1</u>	MSBs	
19 a1h1 19 a1h2	MVTSs	No

19 a1i	Does the Entity have processes and procedures in	
		Yes
	place to identify downstream relationships with	165
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
131		
	offer third party payment services to their customers?	No
<u>19 i1</u>	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
-		
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
	· ·	CCDNIV does not offer neumant conjugate non-bank antition, who may then offer third north neumant conjugat
		CCBNY does not offer payment services to non-bank entities, who may then offer third party payment services
		to their customers.
46.1	D: ( D ):	<u></u>
<u>19 j</u>	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
<u>19 m</u>	Stored Value Instruments	No
<u>19 n</u>	Trade Finance	Yes
19 o	Virtual Assets	No
		····
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
		110
<u>19 p1a</u>	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
		No
19 p3	<u>u</u>	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
	If yes, state the applicable level of due diligence	
19 p4a		
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including describing	
		CCBNY does not offer any banking services to walk-in customers.
	the level of due diligence.	CCBNY does not offer any banking services to walk-in customers.
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20 20 a  21 21 22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i  22 j	the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section 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.  F & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	No Information provided solely on the behalf of the New York Branch of China Construction Bank  Effective, January 2021, the New York branch of China Construction Bank suspended its USD Clearing Business, on behalf of Foreign Financial Institutions (FFIs). Payment activity processed on behalf of direct customers of the New York Branch of China Construction Bank.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

22 m 22 n 22 o	STRUMBURGO DAMENTO HADAMINA	Voc
	Suspicious Activity Reporting	Yes
<b>22</b> 0	Training and Education	Yes
00	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	11-100
0.1	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior  Management Committee? If N. describe your practice in	Yes
25	Management Committee? If N, describe your practice in Question 29  Does the Board receive, assess, and challenge regular reporting on the status of the AML CTE & Senations	
26	reporting on the status of the AML, CTF, & Sanctions programme?  Does the Entity use third parties to carry out any	Yes
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above	
<del></del>	Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
29	If appropriate, provide any additional information/context to the answers in this section.	CCBNY's maitnains a OFAC and AML Compliance Programs, to ensure compliance with applicable U.S. Sanctions and Anti-Money Laundering regulations.
	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report	Yes
31	bribery and corruption?  Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for	Yes
33	Coordinating the ABC programme?  Does the Entity have adequate staff with appropriate	\(\frac{1}{2} = \frac{1}{2} \)
	levels of experience/expertise to implement the ABC	Yes
	programme?	
	programme? Is the Entity's ABC programme applicable to:	Yes Third parties acting on behalf of the Entity
34 35	programme? Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	
	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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	
34 35	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.	Third parties acting on behalf of the Entity  Yes
34 35 35 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction	Third parties acting on behalf of the Entity  Yes
34 35 35 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the	Third parties acting on behalf of the Entity  Yes  Yes
34 35 35 a 35 b 35 c	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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 Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular	Third parties acting on behalf of the Entity  Yes  Yes  Yes
34 35 35 a 35 b 35 c	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes
34 35 35 35 a 35 b 35 c	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes
34 35 35 a 35 b 35 c 36 37 38	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
34 35 35 35 a 35 b 35 c 36 37 38	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  May-23
34 35 35 a 35 b 35 c 36 37 38 38 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  May-23
34 35 35 a 35 b 35 c 36 37 38 38 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
34 35 35 35 a 35 b 35 c 36 37 38 38 39 40 40 a	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
34 35 35 a 35 b 35 c 36 37 38 38 39 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye
34 35 35 a 35 b 35 c 36 37 38 38 a 39 40 40 a 40 b	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:  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.  Includes enhanced requirements regarding interaction with public officials?  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)?  Does the Entity have controls in place to monitor the effectiveness of their ABC programme?  Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?  Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?  If N, provide the date when the last ABC EWRA was completed.  Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  Does the Entity's ABC EWRA cover the inherent risk components detailed below:  Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality,	Third parties acting on behalf of the Entity  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye

		rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	Yes
40.6	subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
45	If appropriate, provide any additional information/context to the answers in this section.	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S. regulations.
5. AML, 0	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide	Yes
49 d	banking services to unlicensed banks  Prohibit accounts/relationships with shell banks	Yes
49 d 49 e	Prohibit dealing with another entity that provides	
	services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

Deline the process for escalaring financial crime fish specified by process or escalaring financial crime fish processors (processors) and processors of the improvement of the processor of the processor for extinguishment of the processor for extinguishment of the processor for extinguishment of the processor for the processor for extinguishment of the processor for extinguishment of the processor for the processor for extinguishment of the processor for t	40:		
Issuespeptionally surplicous setting your products by process and process an	491	Define the process for escalating financial crime risk	
anniholasse 40 k Debre the process, where approprise, for terminating sesting continuer relationships does be fracised crime. 40 k Debre the process of exciting continuer relationships does be fracised crime. 40 k Debre the process of exciting crime for fracing crime recovers that applies across the unifold points for fracing crime recovers that applies across the unifold points for fracing crime recovers that applies across the unifold points for fracing crime recovers if the processor of the processor of the processor of the relationship of the processor of the processor of the processor of the relationship of the processor o	40 1	· · · · · · · · · · · · · · · · · · ·	Yes
Define the process, where appropriate, for terminating existing authority educations of educations of the Control of the Contr			
conting austram entainventilipe, but to instructed crime.  48	40 :		
disk	49 J		
Desire the process for enting clients for financial crime excision. Insignation across the entity, including experimental continuous and affiliate experimental continuous experimental continuous experimental continuous experimental experimenta		existing customer relationships due to financial crime	Yes
reasons that applies across the entry, including special processes and corrote to be included to the processes and corrote to be included to the processes and corrote to be included to corror reasons if they want for evaluation and applications of the processes regarding screening for continue to proceed the processes regarding for continue to proceed the process and continue to proceed the processes regarding for cont		TO:	
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Define the process and corridors to identify and handle currenters that were previously existed for handled crime reasons if they seak to re-establish a crime reasons in the crime reasons in the manufacture of internal development of the crime reasons in the crime reasons of the manufacture of internal crime reasons in the process of the manufacture of internal crime reasons in the reasons of the crime reasons in the crime reasons in the reasons of the crime reasons in the crime reasons			
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49 m Outline the processes regarding sorearing for sentations. PEPS and Advises MedicinNegative News  49 n Outline the processes to the maintenance of internal Pops  50 Its the Entity father of risk tolerance settement or smith document which defines an ake bounday around their business?  51 Does the Entity have record internal Pops  52 Confirm that all responses provided in the above Section are representative of all the LES branches.  53 If you have a constitution of the processes of the maintenance of the provided solely on the behalf of the New York Brench of China Construction Bank.  53 If appropriate, provide any additional information/commax to the answers in this section.  54 If appropriate, provide any additional information/commax to the answers in this section.  55 If appropriate, provide any additional information/commax to the answers in this section.  56 If appropriate, provide any additional information/commax to the answers in this section.  57 If appropriate, provide any additional information/commax to the answers in this section.  58 If appropriate, provide any additional information/commax to the answers in this section.  59 If appropriate, provide any additional information/commax to the answers in this section.  50 If appropriate, provide any additional information/commax to the answers in this section.  50 If appropriate, provide any additional information/commax to the answers in this section.  50 If appropriate, provide any additional information/commax to the answers in this section.  51 If appropriate, provide any additional information/commax to the answers in this section.  52 If appropriate, provide any additional information/commax to the answers in this section.  53 If appropriate, provide any additional information/commax to the answers in this section.  54 If appropriate, provide any additional information/commax to the answers in this section.  55 If appropriate, provide any additional information/commax to the any additional information to the any additional information to th			Yes
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sanctions, PEPs and Ackerse Media/Negative News   Yes    49 n   Cultim the processor for the maintenance of internal    49 n   Cultim the processor for the maintenance of internal    40 n   Cultim the processor for the maintenance of internal    40 n   Cultim the processor for the maintenance of internal    40 n   Cultim the first which defines a fisk bolerance statement or senitar document which defines a fisk boundary around    51   Does the Entity New Local    52   Confirm that all responses provided in the above    52   Confirm that all responses provided in the above    53   Section are maintenance internal    54   Section are maintenance internal    55   Internal    56   Internal    57   Internal    68   AML CTF & SANCTIONS RISK ASSESSMENT    69   Author    69   Author    60   Author    60   Author    60   Author    61   Author    62   Author    63   Author    64   Chernal    64   Chernal    65   Author    66   Author    67   Author    68   Companions declared below    69   Author    60   Chernal    6	10 m		
49 n. Outline the processor for the maintenance of internal yes selected to the control of the c	43 III		Yes
- "validifility"   1905  Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around herb business?  Does the Entity defined a risk tolerance statement or similar document which defines a risk boundary around herb business?  Does the Entity All to See the Carbon procedures that the second procedures that the second procedures that If Y, what is the referrition period?  Syears or more  52		sanctions, PEPs and Adverse Media/Negative News	
He the Entity defined a risk bottemore statement at the Entity defined a risk boundary around better the Entity defined a risk boundary around better the Entity defined a risk boundary around better the Entity and the Entity and Entity defined a risk boundary around better the Entity and Entity defined a risk boundary around better the Entity and Entity defined a risk boundary around better the Entity and Entity defined and Entity defined and Entity and Enti	49 n	Outline the processes for the maintenance of internal	Voc
similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that common with applicable isse?  If Y, what is the retention period?  Syears or more  52		"watchlists"	
similar document which defines a risk boundary around their business?  Does the Entity have record retention procedures that common with applicable isse?  If Y, what is the retention period?  Syears or more  52	50	Has the Entity defined a risk tolerance statement or	
thost husbroas?  15 do Does the Entity have record retartion procedures that combot with applicable laws?  16 v. What is the retention period?  17 v. What is the retention period?  18 v. What is the retention period?  19 v. What is the retention period?  19 v. What is the retention period?  10 v. Sention are requirements and the law of the behalf of the New York Branch of China Construction Bank  10 v. What is the sention and the behalf of the New York Branch of China Construction Bank  10 v. What is the propriete, provide any additional information/borted to the answers in this socious.  10 v. What is the propriete, provide any additional information/borted to the answers in this socious.  10 v. What is the propriete, provide any additional information/borted to the answers in this socious.  10 v. What is the propriete, provide any additional information/borted to the answers in this socious.  10 v. What is the propriete provide any additional information/borted to the answers in this socious.  10 v. What is the propriete provide any additional information/borted to the answers in this socious.  10 v. What is the propriete provide any additional information/borted to the answers in this socious.  10 v. What is the propriete provide any additional information/borted to the answers in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What is the propriete provide any additional information in this socious.  10 v. What			Yes
51 Does the Entity have record retention procedures that normal with anothers before the retention period?  52 Confirm that all responses provided in the above Section are representative of all the LFs branches of the Confirm that all responses provided in the above and the branches that this supplies to the answers in this suction.  53 If appropriate, provide any additional information/context to the answers in this suction.  54 If appropriate, provide any additional information/context to the answers in this suction.  55 If appropriate, provide any additional information/context to the answers in this suction.  56 AML CTF & SANCTIONS RISK ASSESSMENT  56 Does the Entity's AML & CTF EWRA cover the inherent insic components detailed below.  57 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  58 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's AML & CTF EWRA cover the inherent in the substance of the control		•	
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5 years or more  Confirm that all responses provided in the above Section are reorganizative of all the LE's branches  To and the branch's that this applies to the answers in this section.  To appropriate, provide any additional information'context to the answers in this section.  To appropriate, provide any additional information's to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate, provide any additional information's context to the answers in this section.  To appropriate provide any additional information's context to the answers in this section.  To appropriate provides and answers to the answers that Basel and FATE guidelines. CCBN implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S. To applie the Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S. To applie the Compliance Programs, to all context with Head Office Global Compliance Standards, and U.S. To applie the Compliance Programs, to all context with Head Office Global Compliance Standards, and U.S. To applie the Compliance Standards, and U.S. To applie the Compliance Programs, to all context with Head Office Global Compliance Standards, and U.S. To applie the Compliance Programs, to all context with Head Office Global Compliance Standards, and U.S. To applie the Complian	<b>-</b> -		Yes
52 Confirm that all responses provided in the above Section, are representative of all the LFs branches 52 a If N. Carley wind loquestions the difference's relate to and the branch'es that this applies to.  11 appropriate, provided any additional information/context to the answers in this section.  12 appropriate, provide any additional information/context to the answers in this section.  13 If appropriate, provide any additional information/context to the answers in this section.  14 appropriate, provide any additional information/context to the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  15 and the transport of the answers in this section.  16 and the transport of the answers in this section.  17 answers of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers in this section.  18 and the transport of the answers	51 a		
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B. AML, CTF & SANCTIONS RISK ASSESSMENT			, ,
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54 a     Client     Yes       54 b     Product     Yes       54 c     Channel     Yes       54 d     Geography     Yes       55     Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:     Yes       55 a     Transaction Monitoring     Yes       55 b     Customer Due Diligence     Yes       55 c     PEP Identification     Yes       55 d     Transaction Screening     Yes       55 d     Transaction Screening against Adverse Media/Negative News     Yes       News     News     Yes       55 f     Training and Education     Yes       55 g     Governance     Yes       55 h     Management Information     Yes       55 h     Management Information     Yes       56 a     If N, provide the date when the last AML & CTF     Yes       57 a     Does the Entity's Sanctions EWRA cover the inherent tisk components detailed below:     Yes       57 c     Channel     Yes       57 d     Geography     Yes       58 d     Customer Due Diligence     Yes       58 c     List Management     Yes       58 b     Governance     Yes       58 c     List Management     Yes	•	•	
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S5 b   Customer Due Diligence   Yes			
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St c		Transaction Monitoring	
Transaction Screening   Yes	55 b	Transaction Monitoring Customer Due Diligence	
Name Screening against Adverse Media/Negative   Yes	55 b	Transaction Monitoring Customer Due Diligence	Yes
News  55 f Training and Education  Yes  55 g Governance  Yes  55 h Management Information  Yes  56 Has the Entity's AML & CTF EWRA been completed in the last 12 months?  The las	55 b 55 c	Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes
Training and Education   Yes	55 b 55 c 55 d	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes
S5 g   Governance   Yes	55 b 55 c 55 d	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes
Management Information   Yes	55 b 55 c 55 d 55 e	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes
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58 aCustomer Due DiligenceYes58 bGovernanceYes58 cList ManagementYes	55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
58 bGovernanceYes58 cList ManagementYes	55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d	Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's Sanctions EWRA cover the controls	Yes
58 c List Management Yes	55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58	Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes         Yes
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	T., 2	
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
<u> </u>	the last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above	No
	Section are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
		Information is provided solely on the behalf of the New York Branch of Offina Construction Bank
61	If appropriate, provide any additional information/context	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program
	to the answers in this section.	global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has
		implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S.
		regulations.
7 KYC CE	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h 65	Source of wealth  Are each of the following identified:	Yes
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	
	to beneficial ownership identification?	10%
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the	
67 a1	customer's risk classification? Select all that apply:  Product Usage	Yes
67 a1	Geography	Yes
67 a2	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		The Customer Risk Rating Process, also considers the length of customer relationship, the type of corporate
		entity, and the trade areas were customer does business
		<b>,</b> ,
68	For high risk non-individual customers, is a site visit a	
<del>55</del>	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	
68 a3	Trigger event	Yes
68 a4	Other	
68 a4a	If yes, please specify "Other"	
		Site visite for HICH Rick, calcated austomore as retating schodule
		Site visits for HIGH Risk, selected customers on rotating schedule
69	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Yes
	News?	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes
_		

60.63	Trigger event	Voc
69 a3 70	Trigger event  What is the method used by the Entity to screen for	Yes
<i>1</i> U	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by	Yes
74 -	PFPs?	
71 a 71 a1	If Y, is this at: Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Voo
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
<b>75</b>	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Prohibited  Always subject to EDD
76 j 76 k	Non-Government Organisations  Non-resident customers	Always subject to EDD Always subject to EDD
76 K	Nuclear power	Prohibited
76 m	Payment Service Providers	Prohibited
76 n	PEPs PEPS	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited FDD
76 s	Regulated charities	Always subject to EDD
76 t 76 u	Shell banks Travel and Tour Companies	Prohibited Always subject to EDD
76 u	Unregulated charities	Prohibited
76 W	Used Car Dealers	Prohibited
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or	
	compliance approval?	Yes

T	
	Both
Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
Does the Entity perform an additional control or quality	Yes
Confirm that all responses provided in the above	No
If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Information is provided solely on the behalf of the New York Branch of China Construction Bank
If appropriate, provide any additional information/context to the answers in this section.	With respect to Item #79, CCBNY does not maintain account with individuals/entities that act as financial intermediaries.
ORING & REPORTING	
Does the Entity have risk based policies, procedures and monitoring processes for the identification and	Yes
What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
If manual or combination selected, specify what type of transactions are monitored manually	In addition to alerts generated by the Branch's Transaction Monitoring systems, CCBNY may initiate a manual transaction search, in response to a trigger event, adverse media report or as part of a due diligence investigation.
If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Prime Compliance Suites, and WorldCheck
When was the tool last updated?	1-2 years
When was the automated Transaction Monitoring	< 1 year
Does the Entity have regulatory requirements to report	Yes
If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	Yes
Does the Entity have policies, procedures and processes to review and escalate matters arising from	Yes
Does the Entity have a data quality management programme to ensure that complete data for all	Yes
transactions are subject to monitoring?	165
transactions are subject to monitoring?  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
transactions are subject to monitoring?  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a	
transactions are subject to monitoring?  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?  Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
transactions are subject to monitoring?  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?  Confirm that all responses provided in the above	Yes Yes
transactions are subject to monitoring?  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?  Confirm that all responses provided in the above Section 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  Yes  No  Information is provided solely on the behalf of the New York Branch of China Construction Bank  CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program
transactions are subject to monitoring?  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?  Confirm that all responses provided in the above Section 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  No  Information is provided solely on the behalf of the New York Branch of China Construction Bank  CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S.
	accountants, consultants, real estate agents?  Does the Entity perform an additional control or quality review on clients subject to EDD?  Confirm that all responses provided in the above Section 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.  DRING & REPORTING  Does the Entity have risk based policies, procedures and monitoring processes for the identification and renorting of suspicious activity?  What is the method used by the Entity to monitor transactions for suspicious activities?  If manual or combination selected, specify what type of transactions are monitored manually  If automated or combination selected, are internal system or vendor-sourced tools used?  If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?  When was the automated Transaction Monitoring application last calibrated?  Does the Entity have regulatory requirements to report suspicious transactions?  If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting reguirements?  Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?  Does the Entity have a data quality management

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to	
93 a	ensure compliance with: FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Bank Secrecy Act
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
97	If appropriate, provide any additional information/context to the answers in this section.	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S. regulations.
10. SANCT		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's level in rigidiation)?	Yes
100	within the other entity's local jurisdiction)?  Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against	Yes
102	Sanctions Lists? What is the method used by the Entity for sanctions	Automated
102 a	screening?  If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	FircoSoft Continuity (Transaction Screening) and FircoSoft Continuity (Customer Batch Screening)
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104 105	What is the method used by the Entity?  Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Automated Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners (i.e. reference data)
106 b	Sanctions List (UN) United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Not used
106 d	European Union Consolidated List (EU)	Used for filtering transactional data

106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	
1001	Other (speeliy)	
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the	
	entity updates their active manual and/or automated	
	screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g.	
	branches, subsidiaries, or representative offices located	
	•	No
	EU or G7 member countries have enacted	
	comprehensive jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above	
103	Section are representative of all the LE's branches	No
109 a	If N, clarify which questions the difference/s relate to	
103 a		
	and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
		Promote delay and the state of
110	If appropriate, provide any additional information/context	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program
	to the answers in this section.	global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has
		implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S.
==		regulations.
	NG & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	Yes
	government authorities	
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant for	Yes
	the types of products and services offered	
111 c	Internal policies for controlling money laundering,	Yes
	terrorist financing and sanctions violations	
111 d	New issues that occur in the market, e.g. significant	Yes
444	regulatory actions or new regulations	
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
<u>112 d</u>	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have	Yes
	been outsourced	
<u>112 f</u>	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training	
	that is targeted to specific roles, responsibilities and	Voo
	high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML,	
	CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	No
	10000001 are representative of all the LES Didniches	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branen, so that the applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
440	If an arrange to a result it a result if the second state of the s	
116	If appropriate, provide any additional information/context to the answers in this section.	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has
		implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S. regulations.
12. QUALIT	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
119 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
120	If appropriate, provide any additional information/context to the answers in this section.	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S.
		regulations.
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular	
	hacic?	
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent	
123 a	third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology Transaction Manitoring	Yes
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes Yes
123 J 123 k	Training & Education	Yes
123 I	Other (specify)	163
		The Audit Function also reviews the Corporate Compliance function
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	No
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
126	If appropriate, provide any additional information/context to the answers in this section.	CCB has implemented Global Compliance Standards, outlining minimum Compliance Policy and Program global requirements, for all CCB branches, which are consistent with Basel and FATF guidelines. CCBNY has implemented Compliance Programs, consistent with Head Office Global Compliance Standards, and U.S. regulations.
14. FRAU	D	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for	No
	preventing & detecting fraud?	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Information is provided solely on the behalf of the New York Branch of China Construction Bank
132		CCBNY has implemented various fraud controls, through its AML Monitoring Program, and staff are trained to detect and report suspected fraudulent transactions, to Compliance for further review.

### **Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

\_China Construction Bank - New York Branch (Financial Institution 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.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

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

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I,Xuelei Wang	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this	Nolfsberg CBDDQ are
complete and correct to r	t to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.	

I, _Mildred Harper, Chief Compliance Officer	(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 authori	sed to execute this declaration on behalf of the Financial Institution.

DocuSigned by:

5/10/2023

DocuSigned by:

Mildred Harry

5/10/2023

(Signature & Date)

5/10/2023

(Signature & Date)