



Financial Institution Name: NMB BANK LIMITED  
 Location (Country) : NEPAL

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

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	NMB Bank Limited
2	Append a list of foreign branches which are covered by this questionnaire	All the domestic branches of NMB Bank Limited are listed in Appendix A
3	Full Legal (Registered) Address	NMB Bank, Babarmahal, kathmandu, Nepal
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	15th October 1995
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes <input checked="" type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	Nepal Stock Exchange Limited
6 b	Member Owned/Mutual	No <input checked="" type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input checked="" type="checkbox"/>
6 d	Privately Owned	No <input checked="" type="checkbox"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No <input checked="" type="checkbox"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Nepal Rastra Bank
11	Provide Legal Entity Identifier (LEI) if available	254900J5HF0UC3SLM620
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

13	Jurisdiction of licensing authority and regulator of ultimate parent	N/A
<b>14 Select the business areas applicable to the Entity</b>		
14 a	Retail Banking	Yes <input type="checkbox"/>
14 b	Private Banking	No <input type="checkbox"/>
14 c	Commercial Banking	Yes <input type="checkbox"/>
14 d	Transactional Banking	Yes <input type="checkbox"/>
14 e	Investment Banking	No <input type="checkbox"/>
14 f	Financial Markets Trading	Yes <input type="checkbox"/>
14 g	Securities Services/Custody	No <input type="checkbox"/>
14 h	Broker/Dealer	No <input type="checkbox"/>
14 i	Multilateral Development Bank	No <input type="checkbox"/>
14 j	Wealth Management	No <input type="checkbox"/>
14 k	Other (please explain)	N/A
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 bank services are provided)	No <input type="checkbox"/>
15 a	If Y, provide the top five countries where the non-resident customers are located.	N/A
16	Select the closest value:	
16 a	Number of employees	1001-5000 <input type="checkbox"/>
16 b	Total Assets	Greater than \$500 million <input type="checkbox"/>
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes <input type="checkbox"/>
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes <input type="checkbox"/>
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No <input type="checkbox"/>
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No <input type="checkbox"/>
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No <input type="checkbox"/>
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes <input type="checkbox"/>
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No <input type="checkbox"/>
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No <input type="checkbox"/>
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	No <input type="checkbox"/>
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No <input type="checkbox"/>
19 a1h2	MVTs	No <input type="checkbox"/>
19 a1h3	PSPs	No <input type="checkbox"/>

19 a i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	No	<input type="checkbox"/>
19 b	Cross-Border Bulk Cash Delivery	No	<input type="checkbox"/>
19 c	Cross-Border Remittances	Yes	<input type="checkbox"/>
19 d	Domestic Bulk Cash Delivery	No	<input type="checkbox"/>
19 e	Hold Mail	No	<input type="checkbox"/>
19 f	International Cash Letter	No	<input type="checkbox"/>
19 g	Low Price Securities	No	
19 h	Payable Through Accounts	No	
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes	
19 i1	If Y, please select all that apply below?		
19 i2	Third Party Payment Service Providers	Yes	
19 i3	Virtual Asset Service Providers (VASPs)	No	
19 i4	eCommerce Platforms	Yes	
19 i5	Other - Please explain		
19 j	Private Banking	No	<input type="checkbox"/>
19 k	Remote Deposit Capture (RDC)	Yes	
19 l	Sponsoring Private ATMs	No	<input type="checkbox"/>
19 m	Stored Value Instruments	Yes	<input type="checkbox"/>
19 n	Trade Finance	Yes	<input type="checkbox"/>
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	Yes	
19 p1a	If yes, state the applicable level of due diligence	Identification and verification	
19 p2	Wire transfers	Yes	
19 p2a	If yes, state the applicable level of due diligence	Identification and verification	
19 p3	Foreign currency conversion	Yes	
19 p3a	If yes, state the applicable level of due diligence	Due diligence	
19 p4	Sale of Monetary Instruments	No	
19 p4a	If yes, state the applicable level of due diligence	Please select	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	For point no 19 p 3, up to specified threshold, with minimum level of KYC only, these transactions are permitted by regulator.	
19 q	Other high-risk products and services identified by the Entity (please specify)	No	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes	<input type="checkbox"/>
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
21	If appropriate, provide any additional information/context to the answers in this section.	N/A	
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>			
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		
22 a	Appointed Officer with sufficient experience/expertise	Yes	<input type="checkbox"/>
22 b	Adverse Information Screening	Yes	<input type="checkbox"/>
22 c	Beneficial Ownership	Yes	<input type="checkbox"/>
22 d	Cash Reporting	Yes	<input type="checkbox"/>
22 e	CDD	Yes	<input type="checkbox"/>
22 f	EDD	Yes	<input type="checkbox"/>
22 g	Independent Testing	Yes	<input type="checkbox"/>
22 h	Periodic Review	Yes	<input type="checkbox"/>
22 i	Policies and Procedures	Yes	<input type="checkbox"/>
22 j	PEP Screening	Yes	<input type="checkbox"/>
22 k	Risk Assessment	Yes	<input type="checkbox"/>
22 l	Sanctions	Yes	<input type="checkbox"/>

22 m	Suspicious Activity Reporting	Yes	<input type="checkbox"/>
22 n	Training and Education	Yes	<input type="checkbox"/>
22 o	Transaction Monitoring	Yes	<input type="checkbox"/>
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100	
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 Question 29.	Yes	<input type="checkbox"/>
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	<input type="checkbox"/>
26 a	If Y, provide further details	N/A	
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
29	If appropriate, provide any additional information/context to the answers in this section,		
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>			
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	<input type="checkbox"/>
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	<input type="checkbox"/>
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	<input type="checkbox"/>
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	<input type="checkbox"/>
34	Is the Entity's ABC programme applicable to:	Joint ventures	<input type="checkbox"/>
35	Does the Entity have a global ABC policy that:		
35 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	<input type="checkbox"/>
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	<input type="checkbox"/>
35 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	<input type="checkbox"/>
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	<input type="checkbox"/>
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	No	
38 a	If N, provide the date when the last ABC EWRA was completed.	We do not have provision of conduction ABC EWRA	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No	
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	No	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	No	

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	No	
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	No	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	No	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="checkbox"/>
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	<input type="checkbox"/>
42 b	1st Line of Defence	Yes	<input type="checkbox"/>
42 c	2nd Line of Defence	Yes	<input type="checkbox"/>
42 d	3rd Line of Defence	Yes	<input type="checkbox"/>
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	
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	<input type="checkbox"/>
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
45	If appropriate, provide any additional information/context to the answers in this section.	N/A	
<b>5. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>			
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	<input type="checkbox"/>
46 b	Terrorist financing	Yes	<input type="checkbox"/>
46 c	Sanctions violations	Yes	<input type="checkbox"/>
47	Are the Entity's policies and procedures updated at least annually?	Yes	<input type="checkbox"/>
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	<input type="checkbox"/>
48 a1	If Y, does the Entity retain a record of the results?	Yes	<input type="checkbox"/>
48 b	EU Standards	Yes	<input type="checkbox"/>
48 b1	If Y, does the Entity retain a record of the results?	Yes	<input type="checkbox"/>
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="checkbox"/>
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<input type="checkbox"/>
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="checkbox"/>
49 d	Prohibit accounts/relationships with shell banks	Yes	<input type="checkbox"/>
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	<input type="checkbox"/>
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="checkbox"/>
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	<input type="checkbox"/>
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="checkbox"/>

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees .	Yes	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	No	
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	No	
49 l	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	No	
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	<input type="checkbox"/>
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	<input type="checkbox"/>
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="checkbox"/>
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	<input type="checkbox"/>
51 a	If Y, what is the retention period?	5 years or more	<input type="checkbox"/>
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53	If appropriate, provide any additional information/context to the answers in this section.	N/A	
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>			
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	<input type="checkbox"/>
54 b	Product	Yes	<input type="checkbox"/>
54 c	Channel	Yes	<input type="checkbox"/>
54 d	Geography	Yes	<input type="checkbox"/>
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	<input type="checkbox"/>
55 b	Customer Due Diligence	Yes	<input type="checkbox"/>
55 c	PEP Identification	Yes	<input type="checkbox"/>
55 d	Transaction Screening	Yes	<input type="checkbox"/>
55 e	Name Screening against Adverse Media/Negative News	Yes	<input type="checkbox"/>
55 f	Training and Education	Yes	<input type="checkbox"/>
55 g	Governance	Yes	<input type="checkbox"/>
55 h	Management Information	Yes	<input type="checkbox"/>
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	<input type="checkbox"/>
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	N/A	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	<input type="checkbox"/>
57 b	Product	Yes	<input type="checkbox"/>
57 c	Channel	Yes	<input type="checkbox"/>
57 d	Geography	Yes	<input type="checkbox"/>
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	<input type="checkbox"/>
58 b	Governance	Yes	<input type="checkbox"/>
58 c	List Management	Yes	<input type="checkbox"/>
58 d	Management Information	Yes	<input type="checkbox"/>

Handwritten signature and initials in blue ink, including a large flourish and the name 'David S.'.

58 e	Name Screening	Yes	<input type="checkbox"/>
58 f	Transaction Screening	Yes	<input type="checkbox"/>
58 g	Training and Education	Yes	<input type="checkbox"/>
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	<input type="checkbox"/>
59 a	If N, provide the date when the last Sanctions EWRA was completed.	N/A	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	<input type="checkbox"/>
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
61	If appropriate, provide any additional information/context to the answers in this section.	N/A	
<b>7. KYC, CDD and EDD</b>			
62	Does the Entity verify the identity of the customer?	Yes	<input type="checkbox"/>
63	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	<input type="checkbox"/>
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	<input type="checkbox"/>
64 b	Expected activity	Yes	<input type="checkbox"/>
64 c	Nature of business/employment	Yes	<input type="checkbox"/>
64 d	Ownership structure	Yes	<input type="checkbox"/>
64 e	Product usage	Yes	<input type="checkbox"/>
64 f	Purpose and nature of relationship	Yes	<input type="checkbox"/>
64 g	Source of funds	Yes	<input type="checkbox"/>
64 h	Source of wealth	Yes	<input type="checkbox"/>
65	Are each of the following identified:		
65 a	Ultimate beneficial ownership	Yes	<input type="checkbox"/>
65 a1	Are ultimate beneficial owners verified?	Yes	<input type="checkbox"/>
65 b	Authorised signatories (where applicable)	Yes	<input type="checkbox"/>
65 c	Key controllers	Yes	<input type="checkbox"/>
65 d	Other relevant parties	Yes	<input type="checkbox"/>
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%	<input type="checkbox"/>
67	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="checkbox"/>
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1	Product Usage	Yes	<input type="checkbox"/>
67 a2	Geography	Yes	<input type="checkbox"/>
67 a3	Business Type/Industry	Yes	<input type="checkbox"/>
67 a4	Legal Entity type	Yes	<input type="checkbox"/>
67 a5	Adverse Information	Yes	<input type="checkbox"/>
67 a6	Other (specify)	Politically Exposed Person	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No	<input type="checkbox"/>
68 a	If Y, is this at:		
68 a1	Onboarding	No	<input type="checkbox"/>
68 a2	KYC renewal	No	<input type="checkbox"/>
68 a3	Trigger event	No	<input type="checkbox"/>
68 a4	Other	No	<input type="checkbox"/>
68 a4a	If yes, please specify "Other"		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	<input type="checkbox"/>
69 a	If Y, is this at:		
69 a1	Onboarding	Yes	<input type="checkbox"/>
69 a2	KYC renewal	Yes	<input type="checkbox"/>

Handwritten signatures and initials are present at the bottom of the page, including a large signature on the left and several initials in the center and right.

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

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for 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 PEPs?	Yes
71 a	If Y, is this at:	
71 a1	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	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	Bank also proceed to update the KYC when customers requests for any amendments/updates prior any defined frequencies as required.
75	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	Always subject to EDD
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	EDD on risk-based approach
76 d	Extractive industries	Prohibited
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 l	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	No EDD/restriction or prohibition
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	Do not have this category of customer or industry
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	N/A
77	If restricted, provide details of the restriction	NMB Bank Ltd does not engage in business with certain client's in the high risk industries listed as (76i,76k,76a)
78	Does EDD require senior business management and/or compliance approval?	Yes



78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
82	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Unusual cash transaction inconsistent with nature of business etc
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Digital Age Nepal (Anti Money Laundering Solution)
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
91	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	As locally applicable
93 c	If N, explain	N/A
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	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>10. SANCTIONS</b>		
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 local jurisdiction)?	Yes
100	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 Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	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?	World Check System
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	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	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)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	N/A
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 in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
110	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes <input type="checkbox"/>
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes <input type="checkbox"/>
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes <input type="checkbox"/>
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes <input type="checkbox"/>
111 e	Conduct and Culture	Yes <input type="checkbox"/>
111 f	Fraud	Yes <input type="checkbox"/>
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes <input type="checkbox"/>
112 b	1st Line of Defence	Yes <input type="checkbox"/>
112 c	2nd Line of Defence	Yes <input type="checkbox"/>
112 d	3rd Line of Defence	Yes <input type="checkbox"/>
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable <input type="checkbox"/>
112 f	Non-employed workers (contractors/consultants)	No <input type="checkbox"/>
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes <input type="checkbox"/>
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes <input type="checkbox"/>
114 a	If Y, how frequently is training delivered?	Annually <input type="checkbox"/>
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes <input type="checkbox"/>

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
116	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
120	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>13. AUDIT</b>		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
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 third party cover the following areas:	
123 a	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	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	N/A
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	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
126	If appropriate, provide any additional information/context to the answers in this section.	N/A
<b>14. FRAUD</b>		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	No
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?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A

**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)

NMB BANK LTD. (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, SHREEESH SHIMIRE (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 the Financial Institution.

I, DIKUBA PRASAD ADHIKARI (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 the Financial Institution.

8 February 2024 (Signature & Date)

8 February 2024 (Signature & Date)



## Appendix A

Number	Name	Province
1	BABARMAHAL	Province 3
2	BANIPA	Province 3
3	PUTALISADAK	Province 3
4	BUTWAL	Province 5
5	POKHARA	Province 4
6	DHARAN	Province 1
7	BIRATNAGAR	Province 1
8	LUBHU	Province 3
9	THAIBA	Province 3
10	THAMEL	Province 3
11	NEWROAD	Province 3
12	NEPALGUNJ	Province 5
13	DHANGADI	Province 6 & 7
14	KUMARIPATI	Province 3
15	CHABAHIL	Province 3
16	DOTI	Province 6 & 7
17	BIRGUNJ	Province 2
18	KIRNE	Province 3
19	MANTHALI	Province 3
20	DAILEKH	Province 6 & 7
21	KANTIPATH	Province 3
22	DHUNCHE	Province 3
23	BHAKATPUR	Province 3
24	KALANKI	Province 3
25	BIRTAMOD	Province 1
26	BASUNDHARA	Province 3
27	JANAKPUR	Province 2
28	LAHAN	Province 2
29	TRAFFIC CHOWK - BUTWAL	Province 5
30	MANIGRAM	Province 5
31	JEETPUR	Province 5
32	PHARSATIKAR	Province 5
33	SUNAWAL	Province 5
34	MURGIYA	Province 5
35	CHANDRAUTA	Province 5
36	THUTIPIPAL	Province 5
37	CHUTRABESI	Province 5
38	BHALWARI	Province 5
39	CHARNUMBER	Province 5
40	GORUSINGE	Province 5
41	WALING	Province 4
42	ARYABHANYANG	Province 5
43	TAMGAS	Province 5
44	DRIVERTOLE	Province 5
45	BANGAI	Province 5
46	URLABARI	Province 1
47	BELBARI	Province 1
48	TARAHARA	Province 1
49	PATHARI	Province 1
50	DUDHE	Province 1
51	LETANG	Province 1
52	KERABARI	Province 1
53	KANCHANBARI BRT	Province 1
54	MADHUMALLA	Province 1
55	CHANDRAGADHI	Province 1
56	ITAHARI	Province 1
57	KERKHA	Province 1
58	SITAPAILA	Province 3
59	PHIDIM	Province 1
60	KATARI	Province 1
61	THAPATHALI	Province 3
62	TAPLEJUNG	Province 1
63	SALLERI	Province 1
64	TINKUNE	Province 3
65	NAXAL	Province 3
66	BHAIRAHAWA	Province 5
67	DAMAK	Province 1
68	PALPA	Province 5
69	LAMKI	Province 6 & 7
70	TEKU	Province 3
71	PULCHOWK	Province 3
72	TIMURE	Province 3
73	BHOJPUR	Province 1
74	BURTIBANG	Province 4
75	MASURIYA	Province 6 & 7
76	BENI	Province 4
77	NIUGADH	Province 2
78	HETAUDA	Province 3
79	KAWASOTI	Province 3
80	GOIBAZAR	Province 2
81	BARDIBAS	Province 2
82	GAIGHAT	Province 1
83	ILAM	Province 1
84	KOHALPUR	Province 5
85	MAHENDRANAGAR	Province 6 & 7
86	SURKHET	Province 6 & 7
87	TULSIPUR	Province 5
88	GALCHI	Province 3
89	BATESHWAR	Province 2
90	CHULACHULI	Province 1
91	NAUMULE	Province 6 & 7
92	KUDIYASUSTA TRIVENI	Province 5
93	DOTI K. I. SINGH	Province 6 & 7
94	KAPAN	Province 3
95	TILATHI	Province 2
96	SURUNGA	Province 2
97	SAKHUWAN	Province 2
98	NAWARAJPUR	Province 2
99	AURAH	Province 2
100	BISHRAMPUR	Province 2
101	PACHRAUTA	Province 2

Number	Name	Province
102	MAHOTTARI	Province 2
103	SONAMA	Province 2
104	HANSHAPUR	Province 2
105	BELDANDI	Province 6 & 7
106	PAKADI	Province 5
107	SARDI BAGAICHA	Province 3
108	HEADOFFICE, OM	Province 4
109	BAGAR	Province 4
110	AMARSINGH CHOWK	Province 4
111	HEMJA	Province 4
112	BHIMAD	Province 4
113	BHOTEWODAR	Province 4
114	SAFA SADAK DAMAULI	Province 4
115	NAGDANDA	Province 4
116	TURTURE	Province 4
117	MANANG	Province 4
118	NARAYANGADH	Province 3
119	SHISHUWA	Province 4
120	BAGLUNG	Province 4
121	BHARATPUR	Province 3
122	LAMACHAUR	Province 4
123	KUSHMISHERA	Province 4
124	BANDIPUR	Province 4
125	BAGHDARBAR	Province 3
126	BESISHAHAR	Province 4
127	RAMBAZAR	Province 4
128	BHAIRABTOLE	Province 4
129	MAHARAJGUNJ	Province 3
130	GOLMADI BHAKTAPUR	Province 3
131	JOMSOM	Province 4
132	GALYANG	Province 4
133	LAKESIDE	Province 4
134	BOUDDHA	Province 3
135	LEKHNATH	Province 4
136	GORKHA	Province 4
137	ARUGHAT	Province 4
138	DUMRE	Province 4
139	NGT MAINROAD	Province 3
140	DULEGAUDA	Province 4
141	AABUKHARENI	Province 4
142	PARSA	Province 3
143	TANDI	Province 3
144	MANAKAMANA	Province 4
145	BIRAJA	Province 4
146	CHANAULI	Province 3
147	LAMAHI	Province 5
148	BARDAGHAT	Province 5
149	GANGABU	Province 3
150	SATDOBATO	Province 3
151	BANESHWOR	Province 3
152	ROI PA	Province 5
153	DHULABARI	Province 1
154	GOTHAUN	Province 1
155	KALAIYA	Province 2
156	GARUDA	Province 2
157	MALANGWA	Province 2
158	ATTARIYA	Province 6 & 7
159	JHALARI	Province 6 & 7
160	PUNARBASH	Province 6 & 7
161	DADELHURA	Province 6 & 7
162	DAJEE	Province 6 & 7
163	BELAURI	Province 6 & 7
164	SUKHAD	Province 6 & 7
165	BAUNIYA	Province 6 & 7
166	TIKAPUR	Province 6 & 7
167	GULARIYA	Province 6 & 7
168	PHULBARI	Province 6 & 7
169	BAITADI	Province 6 & 7
170	DHANGADHI2	Province 6 & 7
171	DEVINAGAR	Province 5
172	ZERO KILOMETER	Province 4
173	BUDDHA CHOWK	Province 3
174	RAMGRAM	Province 5
175	CHAUTHE	Province 4
176	GWARKO	Province 3
177	GAIDAKOT	Province 3
178	JEETPUR SIMRA	Province 2
179	BALKHU	Province 3
180	BATTAR	Province 3
181	KHUSIBU	Province 3
182	BUDHANILKANTHA	Province 3
183	FURTICHOWK	Province 3
184	BHANDARA	Province 3
185	INARJUWA	Province 1
186	MAHENDRA CHOWK	Province 1
187	TANKI SINUWARI	Province 1
188	JHUMKA	Province 1
189	LALBANDI	Province 2
190	HARIWON	Province 2
191	CHANDRAPUR	Province 2
192	MIRCHAIYA	Province 2
193	BARATHAIJAWA	Province 2
194	GATTHAGHAR	Province 3
195	SIRAHA	Province 2
196	KARKADO	Province 5
197	TAULIHAWA	Province 5
198	NAIKAP	Province 3
199	GHORAH	Province 5
200	NAKHU	Province 3
201	BALAJU	Province 3

