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

the Wolfsberg Group

Financial Institution Name: Location (Country) :

Banco Solidario S.A. Ecuador

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		Banco Solidario S.A.
2	Append a list of foreign branches which are covered	· · · · · · · ·
	by this questionnaire	Not applicable
3	Full Legal (Registered) Address	Amazonas Avenue N36-69 and Corea Street
		Amazonas Avenue N36-69 and Colea Street
4	Full Primary Business Address (if different from	Not applicable
	above)	
5	Date of Entity incorporation/establishment	
5		19/02/1991
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
		res
6 a1	If Y, indicate the exchange traded on and ticker	Bolsa de Valores de Quito
	symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	Orca Credit Holdings LLC
7	0/ - 6 the - Earlie to be to be a second and the second	
'	% of the Entity's total shares composed of bearer	
	shares	0%
8	Does the Entity, or any of its branches, operate under	
•	an Offshore Banking License (OBL)?	No
	- · · · ·	
8 a	If Y, provide the name of the relevant branch/es	Not applicable
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
-	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	Superintendencia de Bancos del Ecuador, SB
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
	Frovide Legal Entity identifier (LEI) II available	Not applicable
12	Provide the full legal name of the ultimate parent (if	
-	different from the Entity completing the DDQ)	Not applicable
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19 a1h2 MVTSs No	19 a1f 19 a1g	with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	No
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19 a1h3 PSPs No	19 a1f 19 a1g 19 a1h 19 a1h	with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	No No No No No

19 a1i Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? No 19 b Cross-Border Bulk Cash Delivery No	
40 h	
19 b Cross-Border Bulk Cash Delivery No	
19 c Cross-Border Remittances	
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? No	
19 i1 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 Not applicable	
19 j Private Banking Yes	
19 k Remote Deposit Capture (RDC) No	
19 I Sponsoring Private ATMs No	
19 m Stored Value Instruments No	
19 n 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 Yes	
19 p1a If yes, state the applicable level of due diligence Identification and verification	
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19 p2 Wire transfers Yes	
19 p2 Wire transfers Yes 19 p2a If yes, state the applicable level of due diligence Due diligence	
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22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
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
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
26 a	If Y, provide further details	Not applicable
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
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
29	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
4. ANTI B	RIBERY & CORRUPTION	
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
31	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 coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Yes
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
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
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
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
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?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	Not Applicable
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
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 a	Third parties to which specific compliance activities	
42 C	subject to ABC risk have been outsourced Non-employed workers as appropriate	Yes
	(contractors/consultants)	No
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	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
45	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
	F & SANCTIONS POLICIES & PROCEDURES	
5. AML, CT 46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Yes
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes Yes Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49 49 a 49 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes Yes Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a1 48 b1 49 a 49 b 49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 48 a1 48 b1 49 a 49 b 49 c 49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides	Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 a 48 a1 48 b1 49 d 49 c 49 d 49 e 49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
46 46 a 46 b 46 c 47 48 a 48 a1 48 b1 49 a 49 c 49 d 49 e	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes

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	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
491	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	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
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.	Not applicable
53	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
	F & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d		N
	Geography	Yes
55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	165
55 55 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes
55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes
55 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes
55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes
55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes
55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes
55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes
55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes
55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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	Yes
55 55 a 55 b 55 c 55 c 55 d 55 e 55 f 56 a 57	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes Not applicable
55 55 a 55 b 55 c 55 d 55 e 55 f 56 57 57 a	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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	Yes Yes Yes Yes Yes Yes Yes Yes Not applicable
55 55 a 55 b 55 c 55 c 55 d 55 f 55 g 55 h 56 56 57 57 a 57 b	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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	Yes
55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 56 56 56 57 57 57 57 57 57 57	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes Not applicable
55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 56 57 57 57 57 57 57 57	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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 Not applicable Yes Yes
55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 56 57 57 57 57 57 57 57 57 57 57 58	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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 Yes Yes Yes Yes Yes Yes Not applicable
55 55 55 55 55 55 55 55 55 55 55 55 56 57 57 57 58	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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 Yes Yes Yes Yes Yes Yes Yes Not applicable
55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 55 56 57 57 57 57 57 57 57 57 57 57 58	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 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 Yes Yes Yes Yes Yes Yes Not applicable

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 the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	Not applicable
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a 61	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
01	information/context to the answers in this section.	Not applicable
7. KYC, C	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 or within 30 days?	Yes
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	Source of wealth	Yes
65	Are each of the following identified:	
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?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
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
67 a2	Geography	Yes
67 a3 67 a4	Business Type/Industry	Yes Yes
67 a4 67 a5	Legal Entity type Adverse Information	Yes
67 a6	Other (specify)	Not applicable
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3 68 a4	Trigger event Other	Yes
68 a4 68 a4a	If yes, please specify "Other"	Yes Not applicable
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	N
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

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	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	Not applicable
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	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	EDD on risk-based approach
76 d	Extractive industries	Prohibited
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
	· · ·	Prohibited
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	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	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	Not applicable
77	If restricted, provide details of the restriction	A risk based approach
78	Does EDD require senior business management and/ or compliance approval?	No

78 a	If Y indicate who provides the approval:	Not applicable
79	Does the Entity have specific procedures for	Not applicable
	onboarding entities that handle client money such as	Yes
	lawyers, accountants, consultants, real estate agents?	
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	
01	Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
018	and the branch/es that this applies to	Not applicable
	and the branchies that this applies to	
82	If appropriate, provide any additional	Not applicable
	information/context to the answers in this section.	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures	Vee
	and monitoring processes for the identification and reporting of suspicious activity?	Yes
	reporting of suspicious activity :	
94	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what	High risk transactions
	type of transactions are monitored manually	
	If automated or combination selected, are internal	Both
84 b	system or vendor-sourced tools used?	Dour
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	Dish Orated Oracias Advanced
04.01	the name of the vendor/tool?	Risk Control Service Advanced
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	
84 D3	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to	Yes
	report suspicious transactions?	Tes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and	Yes
	processes to review and escalate matters arising from	Tes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
0.	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond	
	to Request For Information (RFIs) from other entities	Yes
	in a timely manner?	
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in	Yes
	a timely manner?	
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	Netenslieskie
1	and the branch/es that this applies to	Not applicable
91	If appropriate, provide any additional	
51	information/context to the answers in this section.	Not applicable
0.043		
	IT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	Yes
1	Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00.0		
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Ecuador's prevention law and regulations
93 c	lf N, explain	Not applicable
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.	Not applicable
97	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
10. SANC	TIONS	
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?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	RISCK CONTROL SERVICE
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	< 1 year
	automated tool? (If 'Other' please explain in Question 110)	
103		Yes

	-	
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 (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	Not applicable
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.	Not applicable
110	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a 112 b	Board and Senior Committee Management 1st Line of Defence	Yes Yes
112 D 112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and 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	Yes
	· •	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
116	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
12. QUALIT	Y 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	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not applicable
120	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
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 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
123 123 a	Does the internal audit function or other independent 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 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h 123 i	Technology Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes Yes
123 k	Training & Education	Yes
123	Other (specify)	Not applicable
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.	Not applicable
126	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
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 preventing & detecting fraud?	Yes

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?	Yes
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.	Not applicable
132	If appropriate, provide any additional information/context to the answers in this section.	Not applicable
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)		
BANCO SOLIDARIO S.A. (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,EDUARDO JAVIER VACA BRITO (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,GERARDO ISRAEL VALLE HARO(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.		
18 de julio del 2025 (Signature & Date)		
18 de julio del 2025 (Signature & Date)		