the Wolfsberg Group

Financial Institution Name: Location (Country): UNION BANK OF INDIA (UK) LIMITED
United Kingdom

No#	Question	Answer
	Y & OWNERSHIP	MIISWEI
1. ENTIT	Full Legal name	
'	Tuli Legal Hame	UNION BANK OF INDIA (UK) LIMITED
2	Append a list of foreign branches which are covered	
	by this questionnaire (if applicable)	
	, , , , ,	
3	Full Legal (Registered) Address	12 Arthur Street, London,
		EC4R 9AB
		United Kingdom
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	1 June 2011
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No 🔽
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No 🖃
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No 🗔
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	No
	shares	
8	Does the Entity, or any of its branches, operate under	No V
	an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	No 🔻
40	provide services only through online channels?	
10	Provide Legal Entity Identifier (LEI) if available	213800AYQA28LZ7J6M48
0 4851	CTE & CANCTIONS PROCESSING	
2. AML, 0	CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets	
[''	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
	0 0 1	
11 a	Appointed Officer with sufficient experience/expertise	Yes
44 5	' '	
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d 11 e	Cash Reporting	Yes Discourse Test Property of the Property of
11 f	CDD EDD	Yes Yes
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Pelicies and Procedures Yes	_	Independent Testing	Yes	믐
11 PEP Screening Ven				
11 k Risk Assessment				=
11 Sanctions Yes	•			
11 m				
11 n			Yes	
Internation Monitoring Yes	11 m	Suspicious Activity Reporting	Yes	
st the Entity's AAL. CTF & Sanctions policy approved at least annually by the Board or equivalent Smicr Management Committee? ves	11 n	Training and Education	Yes	
at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third parties to carry out any programme? 14 Does the Entity to the Committee of the Compliance of the Complian	11 o	Transaction Monitoring	Yes	
components of its AML, CTF & Sanctions programme? 13 a If Y, provide further details Suit Transaction Screening System Retinitive World-Cheek - Sanction screening, PEPs, Adverse media financial - AMLtrac - trasaction monitoring solution & Dow Jones Risk & Compliance 14 Does the entity have a whistleblower policy? 3. ANTI BRIBERY & CORRUPTION 15 Has the Entity documented prolicies and procedures consistent with applicable ASC regulations and requirements to researchably prevent, detected and report bribery and corruption? 16 Does the Entity in the ASC Policies and Procedures? 17 Does the Entity provide mandatory ASC training to: 18 Task and the Procedures? 18 Is Line of Defence 19 Search and Senior Committee Management 19 Search and Senior Committee Management 19 Assets the Entity source and the Committee Management 19 Assets the Entity source and the Committee Management 19 Assets the Entity source and the Committee Management 19 Prohibit deeling with applicable AMC - CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 19 Assets the Entity documents of procedures and procedures consistent with applicable AML - CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 19 A money laundering 19 Does the Entity have policies and procedures that: 19 A money laundering 19 Committee of the Entity Accommittee Management 19 Committee of	12	at least annually by the Board or equivalent Senior	Yes	•
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17 a Board and Senior Committee Management Yes	16	independent third party cover ABC Policies and	Yes	•
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17 b	17 a		Yes	
17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 17 f Non-employed workers as appropriate (contractors/consultants) 17 f Non-employed workers as appropriate (contractors/consultants) 18 has the Entity documented policies and procedures consistent with applicable Mu, CTF & SANCTIONS POLICIES & PROCEDURES 18 Has the Entity documented policies and procedures consistent with applicable AMC, CTF & SANCTIONS POLICIES & PROCEDURES 18 a Money laundering Yes 18 b Terrorist financing Yes 19 b Terrorist financing Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks and/or NBFIs 19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 g Prohibit opening and keeping of accounts for section 311 designated entities 19 g Prohibit dealing with another Entity that provides services to shell banks 19 g Prohibit opening and keeping of accounts for section 31 designated entities 19 g Prohibit opening and keeping of accounts for section 31 designated entities 19 g Prohibit opening and keeping of accounts for section 31 designated entities 19 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 19 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 19 g Define the process for escalating financial crime risk issues/potentially suspicious activity i	17 b	,	Yes	
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sanctions, PEPs and Adverse Media/Negative Yes		risk issues/potentially suspicious activity identified	Yes	•
	19 j	sanctions, PEPs and Adverse Media/Negative	Yes	•

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	•
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	~
21 a	If Y, what is the retention period?	5 years or more	•
5 KYC	CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes	
23	, , ,	163	
	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	•
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	V
24 b	Expected activity	Yes	
24 c	Nature of business/employment	Yes	V
24 d	Ownership structure	Yes	
24 e	Product usage	Yes	<u> </u>
24 f	Purpose and nature of relationship	Yes	
24 g	Source of funds	Yes	
24 h	Source of wealth	Yes	
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	
25 a 25 a1	Are ultimate beneficial owners verified?	Yes	
25 b		Yes	
25 c	Authorised signatories (where applicable)	Yes	
25 d	Key controllers	Yes	
26 26	Other relevant parties Does the due diligence process result in customers receiving a risk classification?	Yes	
27	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	
28	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	•
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	V
29 a	If yes, select all that apply:		
29 a1	Less than one year	Yes	
29 a2	1 – 2 years	Yes	
29 a3	3 – 4 years	No	
29 a4	5 years or more	No	
29 a5	Trigger-based or perpetual monitoring reviews	Yes	V
29 a6	Other (please specify)		
30	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?		
30 a	Arms, Defence, Military	Prohibited	
30 b	Respondent Banks	Prohibited	
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022	Yes	•
30 с	Embassies/Consulates	Do not have this category of customer or industry	
30 d	Extractive industries	Prohibited	<u> </u>
30 e		Prohibited	
	Gambling customers		
30 f	General Trading Companies	EDD on risk-based approach	_
30 g	Marijuana-related Entities	Prohibited	▼
30 h	MSB/MVTS customers	Prohibited	
30 i	Non-account customers	Prohibited	
30 j	Non-Government Organisations	EDD on risk-based approach	V
30 k	Non-resident customers	EDD on risk-based approach	<u> </u>
· ·	NON-TESTUETIL CUSTOTHETS	EDD OIL IISK-Dased applicaci	-

30 I	Nuclear power	Prohibited	
30 m	Payment Service Providers	Prohibited	
30 n	PEPs	Always subject to EDD	
30 о	PEP Close Associates	Always subject to EDD	lacksquare
30 p	PEP Related	Always subject to EDD	V
30 q	Precious metals and stones	Prohibited	
30 r	Red light businesses/Adult entertainment	Prohibited	V
30 s	Regulated charities	EDD on risk-based approach	\blacksquare
30 t	Shell banks	Prohibited	V
30 u	Travel and Tour Companies	EDD on risk-based approach	V
30 v	Unregulated charities	Prohibited	
30 w	Used Car Dealers	Do not have this category of customer or industry	V
30 x	Virtual Asset Service Providers	Prohibited	V
30 y	Other (specify)	Toribled	
31	If restricted, provide details of the restriction		
6. MONI	TORING & REPORTING		
32	Does the Entity have risk based policies, procedures		
	and monitoring processes for the identification and reporting of suspicious activity?	Yes	lacksquare
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	-
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Swift Transaction Screening System AMLtrac system – used for transaction monitoring, generates daily ale that are subsequently investigated and closed by designated staff. The Compliance function (Second Line of Defence) reviews and approves transactions amounting to £5,000 and above	
34	Does the Entity have regulat ory requirements to report suspicious transactions?	Yes	lacksquare
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	•
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
7. PAYM	ENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	V
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	
37 b	Local Regulations	Yes	
37 b1	If Y, Specify the regulation	The Money Laundering, Terrorist Financial and Transfer of Funds (information on the Payer(Regulation 2017 (the MLRs)	
37 с	If N, explain		
8. SANC	TIONS		
38	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	•
39	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	_
			_

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering trar
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering trar
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering trar
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tran
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering tran
41 f	Other (specify)	
42	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 🔻
	IG & EDUCATION	
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes ▼
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c 44 d	2nd Line of Defence	Yes Yes
44 e	3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes Not Applicable
44 f		Not Applicable
10. AUDIT	Non-employed workers (contractors/consultants)	Not Applicable
45	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 ▼
Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) UNION BANK OF INDIA (UK) LIMITED (Financial Institution name)		
, Arun Kumar Selvaraj (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief. 17/10/2025 (Signature & Date)		