the Wolfsberg Group

Financial Institution Name: Location (Country):

BANCO DE LA PROVINCIA DE BUENOS AIRES ARGENTINA

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.

materially diffe	erent than its Entity Head Office, a separate questionnaire can be complete		
	No# Question Answer LENTITY & OWNERSHIP		
<u>1</u> 1≈⊭.\\1	Full Legal Name	<u> - 1 a </u>	
•		BANCO DE LA PROVINCIA DE BUENOS AIRES	
2	Append a list of foreign branches which are covered by this questionnaire	SAN PABLO (BRASIL) - PROVINCIA CASA FINANCIERA (URUGUAY)	
3	Full Legal (Registered) Address	Calle 7 N° 726 (1900) La Plata, Buenos Aires, Argentina	
4	Full Primary Business Address (if different from above)	SAN MARTIN 137, CIUDAD AUTONOMA DE BUENOS AIRES, Argentina	
5	Date of Entity incorporation/establishment	06/09/1822	
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 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 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 authority	BANCO CENTRAL DE LA REPUBLICA ARGENTINA (BCRA) / UNIDAD DE INFORMACION FINANCIERA (UIF)	
11	Provide Legal Entity Identifier (LEI) if available	579100JDDBCKJJEJC067	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)		
13	Jurisdiction of licensing authority and regulator of ultimate parent	ARGENTINA Cr CLAJODI W. NAC	

Estrategias de Prevención Preverción de Lavado de Activos

14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
	Financial Markets Trading	Yes
14 f		AND THE PERSON NAMED IN COLUMN TO TH
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14]	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided).	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
		10001+
16 a	Number of employees	the state of the s
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 PRODU	CTS & SERVICES	kara arang menerakan kerangan pada ber ang kerang digunakan digunakan berapat an menerakan kerang berang be
	December Entitle offer the following products and applicant	And the control of th
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	·
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	
	, , , , , , , , , , , , , , , , , , , ,	

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40 -41	Dean the Entity have proceeded and procedures	
19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g		No
<u>19 h</u>	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
	The same party payment as the same as a same as a same as a same as a same a sa	140
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 15	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m		No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
		CONTROL CONTRO
19 p	For each of the following please state whether you	[18] 18 14 14 14 14 14 14 14 14 14 14 14 14 14
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	to great and the control of the cont
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3		No .
	If yes, state the applicable level of due diligence	
19 p3a		
19 p4		No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including	
	describing the level of due diligence.	
19 q	Other high-risk products and services identified by the	
	Entity (please specify)	
20	Confirm that all responses provided in the above Section	
		Voc
	are representative of all the LE's branches.	Yes
20 a	are representative of all the LE's branches.	Yes
20 a	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes
20 a	are representative of all the LE's branches.	Yes
20 a	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes
	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
20 a	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Yes
	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Yes
	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context	Yes
	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context	Yes
21	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
21 3: AML, C1	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
21	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Yes
21 3: AML, C1	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TE:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum	Yes
21 3: AML, C1	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Yes
21 3: AML, CT 22	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
21 3: AML, CT 22 22 a	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Yes
21 3: AML, GT 22 22 a 22 b	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TE-& SANCTIONS PROGRAMME- Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
21 3: AML, C7 22 22 a 22 b 22 c	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes Yes Yes
21 3: AML, C7 22 22 a 22 b 22 c 22 d	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes
21 3: AML, C1 22 22 a 22 b 22 c 22 d 22 e	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
21 3: AML; CT 22 22 a 22 b 22 c 22 d 22 e 22 f	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes
21 3: AML, C1 22 22 a 22 b 22 c 22 d 22 e	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
21 3: AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes
21 3: AML, C7 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TE-& SANCTIONS PROGRAMME— Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes Yes Yes Yes
21 3: AML, C7 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
21 3: AML; CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 l	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TE:& SANCTIONS PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
21 3: AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 j 22 i 22 j 22 k	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS:PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes
21 3: AML; CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 l	are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF:& SANCTIONS:PROGRAMME. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes

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22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o 23	Transaction Monitoring How many full time employees are in the Entity's AML,	Yes
23	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	Yes
	Management Committee? If N, describe your practice in	
25	Question 29. Does the Board receive, assess, and challenge regular	
20	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	No
	components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	•
	}	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above 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.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
	RIBERY & CORRUPTION	and the control of th
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	105
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	Niss Ameticality
35	Is the Entity's ABC programme applicable to: Does the Entity have a global ABC policy that:	Not Applicable
35 a	Prohibits the giving and receiving of bribes? This	The property of the second sec
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
35 b	advantage 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
	outer policy applicable to the Legal Entity)?	
00	Deep the Estitute sectors in the sector to the sector to	
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	V
,	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
	<u></u>	
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
.39	Does the Entity have an ABC residual risk rating that is	
.39	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	In the second se
40 a	Potential liability created by intermediaries and other	Yes
40 b	third-party providers as appropriate Corruption risks associated with the countries and	//
-TU N	industries in which the Entity does business, directly	Yes
	or through intermediaries	I II A
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or	Yes
	public officials	Cr. CLASSIO A. NACCARI
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40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	
40 e	Changes in business activities that may materially	
40 6	increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other	
41		
	independent third party cover ABC Policies and	
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
	subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate	
721	(contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to	
43		Yes
44	specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to]
	and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
m Panet Ja		Language of the graphs of the first of the specification of the control of the co
	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	[10] 이 아이지 않는 그 사람들은 아니라 하나 하는 것이 아이를 가는 것을 받는 것이 하셨다.
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	[2] [2] 하다 그는 그들에 살아보는 그는 사람들이 들어가 살아보는 것이 나는 것으로 가지만 사람들이 다니다.
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
•••	annually?	Yes
48	Has the Entity chosen to compare its policies and	
40	procedures against:	医多种畸形 化二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十二十
48 a	U.S. Standards	Yes
48 a1		Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and	Yes
	fictitious named accounts	169
49 b	Prohibit the opening and keeping of accounts for	Yes
	unlicensed banks and/or NBFIs	169
49 c	Prohibit dealing with other entities that provide	V
	banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	
	services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section	
·	311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of	
70 y	unlicensed/unregulated remittance agents.	
		Yes
	exchanges houses, casa de cambio, bureaux de	
40 h	change or money transfer agents	
49 h	Assess the risks of relationships with domestic and	l _v
	foreign PEPs, including their family and close	Yes
	associates	<u> </u>



49 I	Define the process for escalating financial crime risk	
		Yes
401	employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to	Yes
	financial crime risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes ·
	foreign branches and affiliates	
49 I	Define the process and controls to identify and	
	handle customers that were previously exited for	Yes
	financial crime reasons if they seek to re-establish a	
49 m	relationship Outline the processes regarding screening for	
75 111	sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	0.00 0.	
43 11	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
		Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
51 a	comply with applicable laws? If Y, what is the retention period?	
JIa	ii i, what is the retellment period?	
		5 years or more
52	Confirm that all responses provided in the above Section	
JZ	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.	
	·	
	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
	risk components detailed below:	Yes
54 a	risk components detailed below: Client	Yes
	risk components detailed below:	The state of the s
54 a 54 b	risk components detailed below: Client Product Channel Geography	Yes Yes
54 a 54 b 54 c	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d	risk components detailed below: Client Product Channel Geography 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
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	risk components detailed below: Client Product Channel Geography 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
54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 d 55 e	risk components detailed below: Client Product Channel Geography 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
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	risk components detailed below: Client Product Channel Geography 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	Yes
54 a 54 b 54 c 54 d 55 55 a 55 c 55 c 55 d 55 e	risk components detailed below: Client Product Channel Geography 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	Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	risk components detailed below: Client Product Channel Geography 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	Yes
54 a 54 b 54 c 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography 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?	Yes
54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography 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
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography 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.	Yes
54 a 54 b 54 c 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography 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.	Yes
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70 -	I Nove Committee	V.
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	Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	<u>}</u>	
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	res
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
01	to the answers in this section.	
	to the answers in this section.	
7. KYC. CI	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	<u>ka kata ang ang atawa at kata da kata da kata ang ang at kata ang at kata ang at kata ang at kata ang at kata</u>
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:	the state of the s
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
67	Does the due diligence process result in customers	
01	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	tagin mana antan penggapan antan antan dalam antan darah antan darah antan darah antan darah darah darah darah
· · ·	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a	Vaa
	part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No .
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
		·
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes
		1/1/

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69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Automated
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		Yes
72	What is the method used by the Entity to screen PEPs?	Automated
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	Yes
74 -	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	Yes
74 a1	Less than one year 1 – 2 years	Yes
74 a2	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)	
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	EDD on risk-based approach
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
.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	Prohibited
76 i	Non-account customers	Prohibited EDD on risk-based approach
76 j	Non-Government Organisations Non-resident customers	Prohibited
76 k	Nuclear power	EDD on risk-based approach
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 EDD on risk-based approach
76 u	Travel and Tour Companies Unregulated charities	Prohibited
76 v 76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or	Yes

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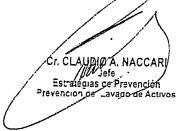
Does the Entity laves appellic procedures for onbearding entities that hand cellent most value a lawy, accountants, consultants, real estate append? 50 Does the Entity perform an additional control or quality ves accountants, consultants, real estate append? 51 an entity entity and additional procedures and any state of the branchise test falls. Est branches and the branchise test falls applies to a first, clarify which questions the difference's relate to a first, clarify which questions the difference's relate to the entity entity of the survivers in this section. 52 If Appropriate, provide any additional information/context to the entwers in this section. 53 Does the Entity have fast based policies, procedures and monitoring processes for the interflication and reporting vest of the interflication and enther or displaced to the entwers in this section. 54 Does the Entity have fast based policies, procedures and monitoring processes for the interflication and enther or displaced to the interflication and enther	78 a	If Y indicate who provides the approval:	Both
entities that handle client money such as lawyers, accountable, considering, real estate spenif? 50 Does the Entity perform an additional control or qualify yes cross the Entity perform an additional control or qualify yes cross the Entity perform an additional control or qualify yes 51 a If N. (anilety which qualifies the EDD in the base's Section are representative of all the LES branches. 51 a If N. (anilety which qualifies the EDD in the base's Section are the transplace of the LES branches. 52 If appropriate, provide any additional information/context to the answers in this section. 53 Does the Entity have take based policies, procedures and monitoring processes for the identification and reporting of samplicus agrinus? 54 a If manual common the Entity have the Section of the Control of Control of the Control of Co	79		DOM:
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18 a contractive on clients subjects to EURO in the above Section services and the EURO personnel of the Company of the American Section and the branchics that this applies to a service of the aniewers in this section. 19 a Section Secti	80	Does the Entity perform an additional control or quality	Voe
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If Vendor-sourced tool of 'Both' selected, what is the name of the vendor/tool?			
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Transparency Standards? 100	92		Yes
		Transparency Standards?	

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CBDDQ V1.4

	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	Ley 25.246, Res UIF 14/2023
93 c	If N, explain	
	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
	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
	Confirm that all responses provided in the above Section	Yes
96 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCT	ONS	
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
	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
	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?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	Doth
102 a1 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Worldsys
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	<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?	Automated
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:	and the state of t
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 LAVDISA. NACCAR

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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)	https://repet.jus.gob.ar/
107	When regulatory authorities make updates to their	 The first based as the first digit to the early of the property what are also have you see the first recovery
	Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	han ha Martin han said a la charactara de la caractara de la caractara de la caractara de la caractara de la c
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.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	NG & EDUCATION	la de la comentació de la completa en la partir de la comunicación de la completa de la completa de la completa La completa de la com
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	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
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



121	risk? Does the Entity have policies in place addressing haddrisk? Does the Entity have a dedicated team responsible for	Yes
14. FRAU	JD: Does the Entity have policies in place addressing fraud	
126	If appropriate, provide any additional information/context to the answers in this section.	
	and the branch/es that this applies to.	
125 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
125	completeness? Confirm that all responses provided in the above section	Yes
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
123 k 123 l	Training & Education Other (specify)	Yes
123 j	Transaction Screening including for sanctions	Yes
123 i	Transaction Monitoring	Yes
123 g 123 h	Suspicious Activity Filing Technology	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 e	Name Screening & List Management	Yes
123 c 123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 b	Enterprise Wide Risk Assessment Governance	Yes Yes
	procedures	Yes
123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
123	Does the internal audit function or other independent	
122 a 122 b	Internal Audit Department External Third Party	Yearly Yearly
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	Voods
	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
121	In addition to inspections by the government	
13. AUDIT		The state of the s
120	If appropriate, provide any additional information/context to the answers in this section.	
119 a	ir N, clamy which questions the difference/s relate to and the branch/es that this applies to.	
	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
119	Compliance Testing process (separate from the independent Audit function)? Confirm that all responses provided in the above Section	Yes
118	Assurance programme for financial crime (separate from the independent Audit function)? Does the Entity have a program wide risk based	Yes
117	Does the Entity have a program wide risk based Quality	
12 OHAU	to the answers in this section.	THE THORES IN THE SECOND TO SECOND STATE OF THE SECOND STATE OF THE SECOND SECO
116	If appropriate, provide any additional information/context	
	and the branch/es that this applies to.	

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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.	·
132	If appropriate, provide any additional information/context to the answers in this section.	

CLAUDIO AMCCARI

Estato 2-3 Ce Prevención

Avado de Activos

avado de Activos

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 de la Provincia de Buenos Aires

(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, ______Sergio Ares___ (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.

Walter Jos CBDDQ are complete and correct to my honest belief, and that Jam authorised to execute this declaration on behalf of the Financial Institution.

(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg

Cr. Sergio Ares

Subgerente Goneralgnature & Date)

(Signature & Date)

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16-9-2024

Prevención del Lavado de Activos