

the Wolfsberg Group

Financial Institution Name:

Metropolitan Bank & Trust Company

Location (Country) :

Philippines

| No # | Question | Answer |
|----------------------------------|---|--|
| 1. ENTITY & OWNERSHIP | | |
| 1 | Full Legal Name | Metropolitan Bank & Trust Company |
| 2 | Append a list of branches which are covered by this questionnaire | Please refer to the Metrobank website for list of domestic and foreign branches Domestic - https://www.metrobank.com.ph/locate_branch.asp Foreign - https://www.metrobank.com.ph/ofw.asp |
| 3 | Full Legal (Registered) Address | Metrobank Plaza, Sen. Gil Puyat Avenue, Urdaneta Village, Makati City, Metro Manila, Philippines |
| 4 | Full Primary Business Address (if different from above) | Metrobank Plaza, Sen. Gil Puyat Avenue, Urdaneta Village, Makati City, Metro Manila, Philippines |
| 5 | Date of Entity incorporation / establishment | April 6, 1962 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | Yes |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | Philippine Stock Exchange, MBT |
| 6 b | Member Owned / Mutual | No |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | No |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | Not Applicable |
| 7 | % of the Entity's total shares composed of bearer shares | None |
| 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 | Not Applicable |

| 2. AML, CTF & SANCTIONS PROGRAMME | | |
|-----------------------------------|--|----------------|
| 9 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 9 a | Appointed Officer with sufficient experience / expertise | Yes |
| 9 b | Cash Reporting | Yes |
| 9 c | CDD | Yes |
| 9 d | EDD | Yes |
| 9 e | Beneficial Ownership | Yes |
| 9 f | Independent Testing | Yes |
| 9 g | Periodic Review | Yes |
| 9 h | Policies and Procedures | Yes |
| 9 i | Risk Assessment | Yes |
| 9 j | Sanctions | Yes |
| 9 k | PEP Screening | Yes |
| 9 l | Adverse Information Screening | Yes |
| 9 m | Suspicious Activity Reporting | Yes |
| 9 n | Training and Education | Yes |
| 9 o | Transaction Monitoring | Yes |
| 10 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | No |
| 11 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | No |
| 11a | If Y, provide further details | |
| 3. ANTI BRIBERY & CORRUPTION | | |
| 12 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | Yes |
| 13 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| 14 | Does the Entity provide mandatory ABC training to: | Yes |
| 14 a | Board and Senior Committee Management | Yes |
| 14 b | 1st Line of Defence | Yes |
| 14 c | 2nd Line of Defence | Yes |
| 14 d | 3rd Line of Defence | Yes |
| 14 e | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced | Not Applicable |
| 14 f | Non-employed workers as appropriate (contractors / consultants) | Yes |

For Item #10 under AML, CFT & Sanctions Program, the Bank's MTPP Manual is approved by the BOD at least once every 2 years pursuant to Philippine AML regulation.

For Section 3 - Anti Bribery & Corruption, this is incorporated in the Bank's Code of Conduct and Whistle Blowing Policy.

| 4. POLICIES & PROCEDURES | | |
|--------------------------|--|-----------------|
| 15 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 15 a | Money laundering | Yes |
| 15 b | Terrorist financing | Yes |
| 15 c | Sanctions violations | Yes |
| 16 | Does the Entity have policies and procedures that: | |
| 16 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 16 b | Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs | Yes |
| 16 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 16 d | Prohibit accounts / relationships with shell banks | Yes |
| 16 e | Prohibit dealing with another Entity that provides services to shell banks | Yes |
| 16 f | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| 16 g | Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents | Yes |
| 16 h | Assess the risks of relationships with PEPs, including their family and close associates | Yes |
| 16 i | Define escalation processes for financial crime risk issues | Yes |
| 16 j | Specify how potentially suspicious activity identified by employees is to be escalated and investigated | Yes |
| 16 k | Outline the processes regarding screening for sanctions, PEPs and negative media | Yes |
| 17 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 18 | Does the Entity have a record retention procedures that comply with applicable laws? | Yes |
| 18 a | If Y, what is the retention period? | 5 years or more |

| 5. KYC, CDD and EDD | | |
|---------------------|--|------------------------------|
| 19 | Does the Entity verify the identity of the customer? | Yes |
| 20 | 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 |
| 21 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 21 a | Ownership structure | Yes |
| 21 b | Customer identification | Yes |
| 21 c | Expected activity | Yes |
| 21 d | Nature of business / employment | Yes |
| 21 e | Product usage | Yes |
| 21 f | Purpose and nature of relationship | Yes |
| 21 g | Source of funds | Yes |
| 21 h | Source of wealth | Yes |
| 22 | Are each of the following identified: | |
| 22 a | Ultimate beneficial ownership | Yes |
| 22 a1 | Are ultimate beneficial owners verified? | Yes |
| 22 b | Authorised signatories (where applicable) | Yes |
| 22 c | Key controllers | Yes |
| 22 d | Other relevant parties | |
| 23 | Does the due diligence process result in customers receiving a risk classification? | Yes |
| 24 | 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 |
| 25 | 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 |
| 26 | Does the Entity have a process to review and update customer information based on: | |
| 26 a | KYC renewal | Yes |
| 26 b | Trigger event | Yes |
| 27 | 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? | |
| 27 a | Non-account customers | Prohibited |
| 27 b | Offshore customers | EDD on a risk based approach |

For Item # 21h, this information is presently being required for "high risk" customers. Said information will be required for all types of customers per recent Philippine AML regulation for implementation by banks in May 2019.

| | | |
|-------|---|---|
| 27 c | Shell banks | Prohibited |
| 27 d | MVTS/ MSB customers | EDD & Restricted on a risk based approach |
| 27 e | PEPs | EDD on a risk based approach |
| 27 f | PEP Related | EDD on a risk based approach |
| 27 g | PEP Close Associate | EDD on a risk based approach |
| 27 h | Correspondent Banks | EDD on a risk based approach |
| 27 h1 | If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014? | Yes |
| 27 i | Arms, defense, military | EDD on a risk based approach |
| 27 j | Atomic power | Prohibited |
| 27 k | Extractive industries | EDD on a risk based approach |
| 27 l | Precious metals and stones | EDD on a risk based approach |
| 27 m | Unregulated charities | Prohibited |
| 27 n | Regulated charities | EDD on a risk based approach |
| 27 o | Red light business / Adult entertainment | Prohibited |
| 27 p | Non-Government Organisations | EDD on a risk based approach |
| 27 q | Virtual currencies | Prohibited |
| 27 r | Marijuana | Prohibited |
| 27 s | Embassies / Consulates | EDD on a risk based approach |
| 27 t | Gambling | Prohibited |
| 27 u | Payment Service Provider | EDD on a risk based approach |
| 27 v | Other (specify) | |
| 28 | If restricted, provide details of the restriction | For Item #27d, Sale of Cashier's Check and Cash Deposit are not allowed for MSB customers |

| 6. MONITORING & REPORTING | | |
|--------------------------------------|---|-----------------------------------|
| 29 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| 30 | What is the method used by the Entity to monitor transactions for suspicious activities? | |
| 30 a | Automated | No |
| 30 b | Manual | No |
| 30 c | Combination of automated and manual | Yes |
| 31 | Does the Entity have regulatory requirements to report currency transactions? | Yes |
| 31 a | If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements? | Yes |
| 32 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| 7. PAYMENT TRANSPARENCY | | |
| 33 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |
| 34 | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: | |
| 34 a | FATF Recommendation 16 | Yes |
| 34 b | Local Regulations | Yes |
| 34 b1 | Specify the regulation | BSP Circular No. 950, as amended. |
| 34 c | If N, explain | Not Applicable |

| 8. SANCTIONS | | |
|-------------------------|--|--|
| 35 | 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 |
| 36 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 37 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 37 a | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 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 |
| 37 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 e | Other (specify) | The Bank subscribes to SWIFT Sanctions Screening. The Bank also uses the FATF List of Jurisdictions subject to Call for Action and Other Monitored Jurisdictions. |
| 38 | Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | No |
| 9. TRAINING & EDUCATION | | |
| 39 | Does the Entity provide mandatory training, which includes : | |
| 39 a | Identification and reporting of transactions to government authorities | Yes |
| 39 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 39 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 39 d | New issues that occur in the market, e.g., significant regulatory actions or new regulations | Yes |
| 40 | Is the above mandatory training provided to : | Yes |
| 40 a | Board and Senior Committee Management | Yes |
| 40 b | 1st Line of Defence | Yes |
| 40 c | 2nd Line of Defence | Yes |
| 40 d | 3rd Line of Defence | Yes |
| 40 e | 3rd parties to which specific FCC activities have been outsourced | Not Applicable |
| 40 f | Non-employed workers (contractors / consultants) | Not Applicable |
| 10. AUDIT | | |
| 41 | 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 and Sanctions policies and practices on a regular basis? | Yes |

NAME: Manolo T. Lugue
TITLE: Head, AML Division

SIGNATURE: 
DATE: 11 April 2019