the Wolfsberg Group

Financial Institution Name: Location (Country) : JPMorgan Chase & Co. Global

No#	Question	Answer
1. ENTIT	TY & OWNERSHIP	
1	Full Legal name	JPMorgan Chase & Co This questionnaire applies to JPMorgan Chase & Co. ("JPMC") and each of its majority owned subsidiaries (toaether with JPMC, the "Firm")
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Please see the Firm's Certification Regarding Correspondent Accounts for Foreign Banks at https://www.jpmorgan.com/content/dam/jpm/global/disclosures/BR/usa-patriot-act-cert.pdf
3	Full Legal (Registered) Address	c/o Corporation Trust Center 1209 Orange Street
4	Full Primary Business Address (if different from above)	Wilmington, DE 19801 United States of America 383 Madison Avenue
		New York, NY 10017 United States of America
5	Date of Entity incorporation / establishment	28-0ct-68
6	Select type of ownership and append an ownership chart if available	Publicly Traded
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	NYSE; JPM
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	N/A
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	Please see the Firm's Certification Regarding Correspondent Accounts for Foreign Banks at https://www.jpmorgan.com/content/dam/jpm/global/disclosures/BR/usa-patriot-act-cert.pdf
2. AML, C	TF & 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
91	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?	Yes
11	Does the Entity use third parties to carry out any	
11a	components of its AML, CTF & Sanctions programme? If Y, provide further details	No On a case-by-case basis lines of business may contract with third parties to perform certain AML
	DIRECT A CORPURTION	controls.
	RIBERY & CORRUPTION	
12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report	Yes
13	bribery and corruption?	
	independent third party cover ABC Policies and Procedures?	Yes
13	Does the Entity's internal audit function or other	Yes

14 a Board and Senior Committee Management Yes 14 b 1st Line of Defence Yes 14 c 2 Intime of Defence Yes 14 d 3rd Line of Defence Yes 15 ABC risk have been outsourced Yes 16 ABC risk have been outsourced Yes 18 ABC risk have been outsourced Yes 19 ABC risk have been outsourced Yes 19 ABC risk have been outsourced Yes 20 ABC risk have been outsourced Yes 21 ABC risk have been outsourced Yes 22 ABC risk have been outsourced Yes 23 ABC risk have been outsourced Yes 24 ABC risk have been outsourced Yes 25 ABC risk have been outsourced Yes 26 ABC risk have been outsourced Yes 26 ABC risk have been outsourced Yes 27 ABC risk have been outsourced Yes 28 ABC risk have been outsourced Yes 28 ABC risk have been outsourced Yes 29 ABC risk have been outsourced Yes 29 ABC risk have been outsourced Yes 29 ABC risk have been outsourced Yes 20 ABC risk have been outsourced Yes 21 ABC risk have been outsourced Yes 21 ABC risk have been outsourced Yes 21 ABC risk have been outsourced Yes 22 ABC risk have been outsourced Yes 24 ABC risk	
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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 Yes	
30 days	
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	
21e Product usage Yes	
21 g Source of funds Yes	
21h 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 c Key controllers Yes	
22 d Other relevant parties Yes, as applicable	
Does the due diligence process result in customers receiving Yes	
a risk classification?	
24 Does the Entity have a risk based approach to screening	
customers and connected parties to determine whether	
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they are PEPs, or controlled by PEPs?	

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27 10 Correspondent Banks EDD on a risk based approach	_		
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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	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
37 f	Other (specify)	The Firm also screens against other applicable lists from time to time.
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. TRAIN	IING & 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 с	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 :	
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)	Yes
10. AUD	n en	
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: Peter J. Neilson
TITLE: Global Head, Financial Crimes Compliance
SIGNATURE:
Jeto Mahn
DATE: / /
7/28/22