



Financial Institution Name :

The First International Bank of Israel Ltd

Location:

Israel

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office level and covering all branches. This questionnaire should not cover more than one LE. Accordingly, each question in the DDQ 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 detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

The questions highlighted in Bold align with the original Wolfsberg Questionnaire.

S.No	Entity & Ownership	Response
1	Full legal name	The First International Bank of Israel Ltd
2	Provide a list of branches which are covered by this questionnaire	All branches in Israel. We have no foreign branches or affiliates. See attached list.
3	Full legal (registered) address	42 Rothschild Boulevard, Tel Aviv, Israel
4	Full primary business address if different from above	As above.
5	Date of Entity Incorporation/ establishment	June 22nd 1972
6	Select type of ownership and append a chart of ownership if available	
a	Publicly Traded (25% of shares publicly traded)	Yes
a1	If Y, indicate the exchange traded on and ticker symbol	Tel Aviv Stock Exchange, ticker symbol FTIN
b	Member Owned/ Mutual	No
c	Government or State Owned over 25%	No
d	Privately Owned	Yes
d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding greater than 10%	See attached chart

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7	% of the Entity's total shares composed of bearer shares	None - the company cannot issue bearer shares
8	Does the Entity, or any of its branches, operate under an offshore banking license (OBL) ?	No
a	If Y, provide the name of the relevant branch/es which operates under an OBL	
9	Name of primary financial regulator / supervisory authority	Bank of Israel
10	Provide Legal Entity Identifier (LEI) if available	2138002RV6AUUX19F397
11	Provide the full legal name of ultimate parent (if different from the Entity completing the DDQ)	F.I.B.I. Holdings Ltd
12	Jurisdiction of licensing authority and regulator of ultimate parent	Israel



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S.No	Entity & Ownership	Response
13	Select the business areas applicable to the Entity	
a	Retail Banking	Yes
b	Private Banking / Wealth Management	Yes
c	Commercial Banking	Yes
d	Transactional Banking	Yes
e	Investment Banking	Yes
f	Financial Markets Trading	Yes
g	Securities Services/ Custody	Yes
h	Broker/Dealer	Yes
i	Multilateral Development Bank	No
j	Other	
14	Does the bank have a significant (>10%) offshore customer base, either by number of customers or by revenue (where offshore means not domiciled in the location where bank services are being provided)?	No
a	If Y, provide details of the country and %	
15	Select the approximate:	
a	Number of employees	1001-5000
b	Total Assets	greater than \$500million
16	Confirm that all responses provided in the above Section I. ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16a	If No, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	PRODUCTS & SERVICES	Response
17	Does the Entity offer the following products and services:	
a	Correspondent Banking	No
a1	If Yes	
a2	Does the Entity offer domestic banks correspondent banking services?	
a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
a4	Does the Entity have processes and procedures in place to identify downstream relationships for domestic banks?	
a5	Does the Entity offer Foreign Banks correspondent banking services?	
a6	Does the Entity allow downstream relationships with Foreign Banks?	
a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
a8	Does the Entity offer regulated MSBs / MVTs correspondent banking services?	
a9	Does the Entity allow downstream relationships with MSBs / MVTs?	



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a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs / MVTs?	
b	Private Banking (domestic & international)	Yes
c	Trade Finance	Yes
d	Payable through Accounts	No
e	Stored Value Instruments	No
f	Cross Border Bulk Cash Delivery	No
g	Domestic Bulk Cash Delivery	No
h	International Cash Letter	Yes
i	Remote Deposit Capture	Yes
j	Virtual / Digital Currencies	No
k	Low Price Securities	No
l	Hold Mail	No
m	Cross Border Remittances	No
n	Service to walk-in customers (non-account holders)	Yes
o	Sponsoring Private ATMs	No
p	Other high risk products and services identified by the Entity	Arms dealers , licensed by the Ministry of Defence .
18	Confirm that all responses provided in the above Section II. PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	



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S.No	AML & SANCTIONS PROGRAMME	Response
19	Does the Entity have a programme that sets minimum AML and Sanctions standards regarding the following components:	
a	Appointed Officer with sufficient experience / expertise	Yes
b	Cash Reporting	Yes
c	CDD	Yes
d	EDD	Yes
e	Beneficial Ownership	Yes
f	Independent Testing	Yes
g	Periodic Review	Yes
h	Policies and Procedures	Yes
i	Risk Assessment	Yes
j	Sanctions	Yes
k	PEP Screening	Yes
l	Adverse Information Screening	Yes
m	Suspicious Activity Reporting	Yes
n	Training and Education	Yes
o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML & Sanctions Compliance Department?	10-50
21	Is the Entity's AML & Sanctions policy approved at least annually by the board or equivalent senior management committee?	Yes
22	Does the Board or equivalent senior management committee receive regular reporting on the status of the AML & Sanctions programme?	Yes
23	Does the Entity use third parties to carry out any components of its AML & Sanctions programme?	No



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23a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML & SANCTIONS are representative of all the LE's branches	Yes
24a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	ANTI BRIBERY & CORRUPTION	Response
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience / expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience / expertise to implement the ABC programme	Yes
29	Is the Entity's ABC programme applicable to:	
a	Joint ventures	Yes
b	Third parties acting on behalf of the Entity	No
30	Does the Entity have a global ABC policy that	
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
b	includes enhanced requirements regarding interaction with public officials	Yes
c	includes a prohibition against the falsification of books and records?	Yes



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31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's board or senior management committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
a	If Y select the frequency	12 months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No



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35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
a	Potential liability created by intermediaries and other third-party providers as appropriate	No
b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
d	Corruption risks associated with gifts and hospitality, hiring / internships, charitable donations and political contributions	Yes
e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures	Yes
37	Does the Entity provide mandatory ABC training to:	
a	Board and senior committee management	No
b	1st Line of Defence	Yes
c	2nd Line of Defence	Yes
d	3rd Line of Defence	Yes
e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	N/A
f	Non-employed workers as appropriate (contractors / consultants)	N/A
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
39	Confirm that all responses provided in the above Section ANTI BRIBERY & CORRUPTION are representative of all the LE's branches	Yes
39a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	POLICIES & PROCEDURES	Response
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
a	Money laundering	Yes
b	Terrorist financing	Yes
c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against / compared to:	
a	US Standards	No
a1	If Y, are any dispensations / waivers provided for such gaps?	
b	EU Standards	No
b1	If Y, are any dispensations / waivers provided for such gaps?	



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43	Does the Entity have policies and procedures that:	
a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
d	Prohibit accounts / relationships with shell banks	Yes
e	Prohibit dealing with another Entity that provides services to shell banks	No
f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
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
h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
i	Define escalation processes for financial crime risk issues	Yes
j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
l	Outline the processes regarding screening for Sanctions, PEPs and negative media	Yes
m	Outline the processes for maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have record retention procedures that comply with applicable laws?	Yes
a	If Y, what is the retention period	Greater than 5 Years
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	AML & SANCTIONS RISK ASSESSMENT	Response
47	Does the Entity's AML EWRA cover the inherent risk components detailed below:	
a	Client	Yes
b	Product	Yes
c	Channel	Yes
d	Geography	Yes
48	Does the Entity's AML EWRA cover the controls effectiveness components detailed below:	
a	Transaction Monitoring	Yes
b	Customer Due Diligence	Yes
c	PEP identification	Yes
d	Transaction Screening	Yes
e	Name Screening against Adverse Media & Negative News	Yes
f	Training and Education	Yes
g	Governance	Yes
h	Management information	Yes
49	Has the Entity's AML EWRA been conducted in the last 12 months?	Yes
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
a	Client	Yes
b	Product	Yes
c	Channel	Yes
d	Geography	Yes



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51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
a	Customer Due Diligence	Yes
b	Transaction Screening	Yes
c	Name Screening	Yes
d	List Management	Yes
e	Training and Education	Yes
f	Governance	Yes
g	Management information	Yes
52	Has the Entity's Sanctions EWRA been conducted in the last 12 months?	Yes
53	Confirm that all responses provided in the above Section AML & SANCTION RISK ASSESSMENT are representative of all the LE's branches	Yes
53a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	KYC, CDD and EDD	Response
54	Does the Entity verify the identity of the customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Please select all that apply	
a	Ownership structure	Yes
b	Customer Identification	Yes
c	Expected activity	Yes
d	Nature of business / employment	Yes
e	Product usage	Yes
f	Purpose and nature of relationship	Yes
g	Source of funds	Yes
h	Source of wealth	Yes
57	Are each of the following identified:	
a	Ultimate beneficial ownership	Yes
a1	Are ultimate beneficial owners verified?	Yes
b	Authorised signatories (where applicable)	Yes
c	Key controllers	Yes
d	Other relevant parties	Yes
58	At a minimum, what is the threshold applied to beneficial ownership identification?	<25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes



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60	If Y, what factors / criteria are used to determine the customer's risk classification? Please select all that apply:	
a	Product usage	Yes
b	Geography	Yes
c	Business type / Industry	Yes
d	Legal Entity type	Yes
e	Adverse information	Yes
f	Other (please specify)	Various risk factors defined by the bank and the personal impression of the interviewer in light of the customer's behavior and the plausibility of his answers.
61	Does the Entity have a risk based approach to screening customers for adverse media / negative news?	Yes
62	If Y, is this at:	
a	Onboarding	Yes
b	KYC renewal	Yes
c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of the above



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S.No	KYC, CDD and EDD	Response
64	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
65	If Y, is this at:	
a	Onboarding	Yes
b	KYC renewal	Yes
c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of the above
67	Does the Entity have policies, procedures and processes to review and escalate matters arising from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
a	Changes in risk classification	Yes
b	KYC renewal	Yes
c	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's AML programme?	
a	Non-account customers	Prohibited
b	Offshore customers	EDD

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of America, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale, Standard Chartered and UBS which aim to develop frameworks and guidance for the management of financial crime risks particularly with respect to Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.



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c	Shell banks	Prohibited
d	MVTS / MSB customers	EDD & Restricted
e	PEPs	EDD & Restricted
f	PEP Related	EDD
g	PEP Close Associate	EDD
h	Correspondent Banks	Prohibited



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h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
i	Arms, defense, military	EDD
j	Atomic power	Prohibited
k	Environment / Corporate Social Responsibility	EDD
l	Precious metals and stones	EDD
m	Unregulated charities	EDD
n	Regulated charities	EDD
o	Red light business / Adult entertainment	Prohibited
p	Non-Government Organisations	EDD
q	Virtual currencies	Prohibited
r	Marjuana	Prohibited
s	Embassies / Consulates	EDD
t	Gambling	Prohibited
u	Payment Service Provider	EDD & Restricted
v	Other (please specify)	
71	If restricted, provide details of the restriction	d. The bank imposes restrictions on the types of transactions for each MSB in an individual manner. e. PEP accounts will be opened only if they have affinity to
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	

71.

d. The bank imposes restrictions on the types of transactions for each MSB in an individual manner

e. PEP accounts will be opened only if they have affinity to the country of Israel

u. If PSP is a bank subsidiary, without restrictions. If privately owned, treated as MSB, see above section d



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S.No	MONITORING & REPORTING	Response
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report currency transactions?	Yes
a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	

According to the Israeli law we check **UNUSUAL** activities rather than suspicious activities



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S.No	PAYMENT TRANSPARENCY	Response
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
a	FATF Recommendation 16	Yes
b	Local regulations	Yes
b1	Specify the regulation	Bank of Israel regulation
c	If N, explain	
82	Does the Entity have processes in place to respond to Request for information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	SANCTIONS	Response
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
87	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
88	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
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
90	What is the method used by the Entity?	Both
91	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
92	What is the method used by the Entity?	Automated
93	Please select the Sanctions Lists used by the Entity in its sanctions screening processes:	
a	Consolidated United Nations Security Council Sanctions List (UN)	Both
b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Both
c	Office of Financial Sanctions Implementation HMT (OFSI)	Both
d	European Union Consolidated List (EU)	Both
e	Lists maintained by other G7 member countries	
f	Other (Please specify)	Bank Of Israel



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94	How timely does the Entity update its lists when new entities are added to Sanctions List?	As it happens or up to 2 business days after
95	How timely are additions or updates to the Sanctions Lists used by the Entity incorporated into the Entity's active screening against:	
a	Customer Data	For new customers(on boarding , name change, etc) - immediately . For existing customers - once a month
b	Transactions	Immediately .
96	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
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	



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S.No	TRAINING & EDUCATION	Response
98	Does the Entity provide mandatory training, which Includes :	
a	Identification and reporting of transactions to government authorities	Yes
b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
d	New Issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
a	Board and senior committee management	No
b	1st Line of Defence	Yes
c	2nd Line of Defence	Yes
d	3rd Line of Defence	Yes
e	3rd parties to which specific FCC activities have been outsourced	No
f	Non-employed workers (contractors/consultants)	No
100	Does the Entity provide AML, Sanctions & CTF training that is targeted to specific roles, responsibilities and HR products, services and activities?	Yes
101	Does the Entity provide customised training for AML and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	QUALITY ASSURANCE / COMPLIANCE TESTING	Response
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a programme wide risk based and independent QA or Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section Quality Assurance / Compliance Testing are representative of all the LE's branches	Yes
105a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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S.No	AUDIT	Response
106	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 and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML & Sanctions programme by the following:	
a	Internal Audit Department	Yearly
b	External Third Party	NA
108	Does the internal audit function or other independent third party cover the following areas:	
a	AML & Sanctions policy and procedures	Yes
b	KYC / CDD / EDD and underlying methodologies	Yes
c	Transaction Monitoring	Yes
d	Transaction Screening including for sanctions	Yes
e	Name Screening & List Management	Yes
f	Training & Education	Yes
g	Technology	Yes
h	Governance	Yes
i	Reporting / Metrics & Management Information	Yes
j	Suspicious Activity Filing	Yes
k	Enterprise Wide Risk Assessment	Yes
l	Other (please specify)	In reference to answer in 108j explicitly According to the Israeli Law, we check "unusual" activities, not suspicious.
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
110a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	



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Wolfsberg Correspondent Banking Due Diligence Questionnaire 2017 (CBDDQ 2017)

Declaration Statement (To be signed by Group Money Laundering Prevention Officer, Global Head of Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance or equivalent position holder AND/OR Global Head of Correspondent Banking)

The First International Bank of Israel Ltd (bank 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 First International Bank of Israel Ltd (bank name) 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 First International Bank of Israel Ltd (bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The First International Bank of Israel Ltd (bank name) 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 on an annual basis. The First International Bank of Israel Ltd (bank name) commits to file accurate supplemental information on a timely basis.

I, Yacov Konortov, Head of Compliance (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 First International Bank of Israel Ltd

I, Arie Tokman, Head of Financial Institutions (Global Head of Correspondent Banking), 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 First International Bank of Israel Ltd (bank name)

Konortov Yacov
Head Of Compliance Staff (Signature & Date)

21.2.2019

Arie Tokman
Head of Financial Institutions
Corporate Division

21/2/2019