the Wolfsberg Group

Location (Country) :

Financial Institution Name: Banco Monex, SA Institución de Banca Múltiple, Monex Grupo Financiero Mexico City, mexico

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.

No#	Question	Answer
1. ENTITY	Y & OWNERSHIP	
1	Full Legal Name	Banco Monex SA Institucion de Banca Múltiple, Monex Grupo Financiero
2	Append a list of foreign branches which are covered by this questionnaire	11 Branches in Mexico
3	Full Legal (Registered) Address	Av. Paseo de la Reforma 234 Piso 15 Col. Juárez, Cuauhtemoc, CDMX, 06600
4	Full Primary Business Address (if different from above)	Same as above
5	Date of Entity incorporation/establishment	2-Apr-1997
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	N/A
6 b	Member Owned/Mutual	No 💌
6 c	Government or State Owned by 25% or more	No No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Héctor Pío Lagos dondé (57.85%) Georgina Teresita Lagos dondé (21.07%) Francisco Lorenzo Lagos dondé (21.07%)
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	N/A
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	Comisión Nacional Bancaria y de Valores (CNBV) Banco de México (Banxico)
11	Provide Legal Entity Identifier (LEI) if available	549300T8MOVNV08XF242
12	Provide the full legal name of the ultimate parent (If different from the Entity completing the DDQ)	Monex SAPI de CV

Page 1

13	Jurisdiction of licensing authority and regulator of ultimate parent	México / Comisión Nacional Bancaria y de Valores (CNBV)
14	Select the business areas applicable to the Entity	
	<u> </u>	
14 a	Retail Banking	No S
14 b	Private Banking	NO India
14 c	Commercial Banking	Yes Interest Yes I
14 d	Transactional Banking	Yes
14 e	Investment Banking	No Emilia
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	No No
14 h	Broker/Dealer	No
141	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	N/A
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.	N/A
16	Select the closest value:	
16 a	Number of employees	1001-5000
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.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
2. PRODU	CTS & SERVICES	
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?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Yes
19 a1h2	MVTSs	No Example 1
19 a1h3	PSPs	Yes

22 I Policies and Procedures Yes 22 j PEP Screening Yes	10 011		
MSSe AVTSRYSPAP 19 b Cross-Border Bulk Cash Delivery 10 c Cross-Border Bulk Cash Delivery 10 d Deres Border Bulk Cash Delivery 10 d Deres Border Bulk Cash Delivery 10 e Hold Mail 10 e Hold Mail 11 Filmstand Jeah Letter 10 p Low Price Securities 12 Control From Securities 13 Percent and Cash Cash Cash Cash Cash Cash Cash Cash	10 011	Does the Entity have processes and procedures	
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19 c		IVIODS /IVIV TOS/ITOF ST	Listan
19 c	19 b	Cross-Border Bulk Cash Delivery	No
19 d Domestic Bullic Cash Delivery No			
Hold Mail No.			<u></u>
International Cash Letter No	19 d	Domestic Bulk Cash Delivery	No
Section Sect	19 e	Hold Mail	No.
19 g Low Price Securities No 19 h Payment services to non-bank entities who may then offer third party payment services to the customers? 19 II Payment services to may be customers? 19 II Payment services to make the customers of the customers? 19 II II Payment Service Providers 19 II Private Banking 19			
Payable Through Accounts No			
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19 2		customers?	1 ⁻⁷⁷
19 2			
19 II Virtual Asset Service Provider (VASPe) 19 II Occimentor Platedores 19 II Officer - Please explain 19 II Private Banking 19 II Private Banking 19 II Private Banking 19 II Sponsoring Provise ATMs 19 IN Segmetor University 19 II Sponsoring Provise ATMs 19 IN Segmetor Value instructions 19 IN Segmetor Value instructions 19 IN Trade Finance 19 IN Trade Finance 19 IN Trade Finance 19 IN Segmetor Value instructions 19 IN Segmetor Value Value Value Value Value 19 IN Segmetor Value Value 19 IN Segmetor Value Value Value Value Value 19 IN Segmetor Value Va	19 i1	If Y , please select all that apply below?	英國語 최고급대 학생님, 함인 소영 교환하다 마다에서 되어 어느 되어 하지만 하루 만든 지원이고 말했다.
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99 I Private Banking 19 I Priv			
19 19 Private Banking			
19 J Private Banking No C	19 i4	eCommerce Platforms	No ·
19 J Private Banking No C	19 i5	Other - Please explain	
19 k Remote Deposit Capture (RDC) No	10 10	Caror I todos oxpiani	
19 k Remote Deposit Capture (RDC) No		i	
19 k Remote Deposit Capture (RDC) No		1	
19 k Remote Deposit Capture (RDC) No			
19 k Remote Deposit Capture (RDC) No			
19 k Remote Deposit Capture (RDC) No	19 j	Private Banking	No
Sponsoring Private ATMs			
19 m			
19 n Trade Finance Yes 19 c Virtual Assets 19 p of For sean of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1	19 i		No
19 n Trade Finance Yes 19 c Virtual Assets 19 p of For sean of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1	19 m	Stored Value Instruments	No East
19 p			
For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1		L	
offer the service to walk in customers and if so, the applicable level of the diligence of the property of the	19 o	Virtual Assets	No
offer the service to walk in customers and if so, the applicable level of the diligence of the property of the	19 n	For each of the following please state whether you	(李子) 사람들은 사람들이 가는 사람들이 되었다. 그 사람들이 되었다. 그 사람들이 나는 사람들이 되었다. 그는 사람들이 가지 않는 것이다.
applicable level of due diligence: 19 p1 Check cashing service 19 p2 Wire Iransfers 19 p2 Wire Iransfers 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p4 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Istruments 19 p4 Sign currency conversion 19 p5 Please select 19 p6 Sale of Monetary Instruments 19 p6 If yes, state the applicable level of due diligence 19 p7 Other high-risk products and services Identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the differences relate to and the branchies that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 22 AMAL; CTF & SANCTIONS PROGRAMME 22 A Appointed Officer with sufficient experience/expertise 22 A Appointed Officer with sufficient experience/expertise 23 Adverse information Screening 24 Adverse information Screening 25 Adverse information Screening 26 Pess 27 A Independent Testing 28 A Independent Testing 29 Yes 21 Perfodic Review 29 Yes 21 Perfodic Review 20 Perfodic Review 21 Perfodic Review 22 Perfodic Review 23 Ness 24 Deep Region Provide and Procedures 25 Perfodic Review 26 Pess 27 Perfodic Review 27 Pess 28 Perfodic Review 29 Perfodic Review 29 Performance Screening 29 Performance Screening 20 Perfodic Review 20 Perfodic Review 20 Perfodic Review 20 Perfodic Review 21 Perfodic Review 22 Perfodic Review 23 Perfodic Review 24 Perfodic Review 25 Perfodic Review 26 Perfodic Review 27 Perfodic Review 27 Performance Screening 28 Perfodic Review 29 Perfodic Review 20 Performance Screening 20 Performance Screening 21 Performance Screening 22 Performance Screening 23 Performance Scre	10 P		【·慈禧等》 13. 特别的 连接的路梯等的影响的 "特丽",他说话,心想是一样的话,就只是这个
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19 p2 Wire transfers No			
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29 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 40 Potential liability created by intermediaries and		Yes	Y
is the net result of the controls effectiveness and the inherent risk assessment? 40 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 40 Potential liability created by intermediaries and	1 2	October 2023	
components detailed below: 40 a Potential liability created by intermediaries and	is the net result of the controls effectiveness and the	Yes	¥
		Yes	Y
other third-party providers as appropriate		Yes	¥.
		Transaction Monitoring How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? If Y, provide further details Does the entity have a whistleblower policy? Confirm that all responses provided in the above Section 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. SRIBERY & CORRUPTION Has the Entity documented policles and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? Does the Entity have an enterprise wide programme that sets minimum ABC standards? Has the Entity happointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? Includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? 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)? Does the Entity ABC Enterprise Wi	Training and Education Transaction Monitoring Transaction Transa

40 b			
	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	¥
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	-
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	¥
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	¥
41	Does the Entity's Internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	•
42	Does the Entity provide mandatory ABC training to:		Ŋ:
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 (contractors/consultants)	Yes	•
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	Y
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
45	If appropriate, provide any additional information/context to the answers in this section.	N/A	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	13.5
46 b	Terrorist financing	Yes	لنسشا
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 procedures against:		
48 a			
	U.S. Standards	Yes	-
48 a1	U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes	
48 a1 48 b 48 b1	If Y, does the Entity retain a record of the results?	Yes	
48 a1 48 b	If Y, does the Entity retain a record of the results? EU Standards	Yes Yes	
48 a1 48 b 48 b1	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes	
48 a1 48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes Yes Yes	
48 a1 48 b 48 b1 49	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes Yes Yes Yes	
48 a1 48 b 48 b1 49 49 a 49 b	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFis Prohibit dealing with other entities that provide	Yes Yes Yes Yes Yes	
48 a1 48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFis Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes Yes Yes Yes Yes Yes	
48 a1 48 b 48 b1 49 49 a 49 b 49 c	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Yes Yes Yes Yes Yes Yes Yes Yes Yes	Y
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFis Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	Yes	Y

49 1	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section 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.	N/A
53	If appropriate, provide any additional information/context to the answers in this section.	Regulatory record retention period is 10 years
S AMI C	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Congression Control Congression (Exp. 1987) and the Congression Co
54 a	Client	Yes
54 b	Product	Yes Yes
54 c 54 d	Channel Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a		
	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	Customer Due Diligence PEP Identification	Yes Yes
	Customer Due Diligence	Yes
55 c 55 d	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes
55 c 55 d 55 e	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes
55 c 55 d 55 e	Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 c 55 d 55 e 55 f 55 g 55 h	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	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 a 57	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 b	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
55 c	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 56 57 57 a 57 c 57 d	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58 a 58 a	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	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. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes

58 e	Name Screening	Yes	
58 f	Transaction Screening	Yes	-
58 g	Training and Education	Yes	لسسا
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	T
59 a	If N, provide the date when the last Sanctions EWRA was completed.	N/A	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	T
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	CHICO:
61	If appropriate, provide any additional information/context to the answers in this section.	N/A	
7. KYC,	CDD and EDD		
62	Does the Entity verify the Identity of the customer?	Yes	23,00,30.5
63	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	V
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	
64 b	Expected activity	Yes	ليسبب
64 c	Nature of business/employment	Yes	السنسا
64 d	Ownership structure	Yes	X.
64 e	Product usage	Yes	
64 f	Purpose and nature of relationship	Yes	Y
64 g	Source of funds	Yes	
64 h	Source of wealth	Yes	
65	Are each of the following identified:		1 1 2 7 1
65 a	Ultimate beneficial ownership	Yes	
65 a1	Are ultimate beneficial owners verified?	Yes	Y
65 b	Authorised signatories (where applicable)	Yes	Y
65 c	Key controllers	Yes	فنستنا
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes 25%	
67	applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification?	Yes	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		Levi
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	X.
67 a6	Other (specify)	PEPs (automatic High Risk) / Public - Quoted Entities / Number of Employees / Dara of Inc	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	\Box
68 a	If Y, is this at:		
68 a1	Onboarding	Yes	X
68 a2	KYC renewal	Yes	
68 a3	Trigger event	Yes	-
68 a4 68 a4a	Other If yes, please specify "Other"	Please select N/A	
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	

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?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	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 rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	Von
74 a1	Less than one year	Tes
74 a2	1 – 2 years	Yes Yes
74 a3 74 a4	3 – 4 years 5 years or more	No
74 a4 74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	KYC renewal is bassed on customer's risk rating. High-risk customer are renewed every year. Customer with other ratings are renewed at least every 3 years. Renewal can be triggered by transactional monitoring alerts, name-screenling alerts, negative news hits, etc.
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	Prohibited
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?	Yes
76 c	Embassies/Consulates	Prohibited
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Prohibited
76 i	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 0	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	Prohibited
76 q	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
	Travel and Tour Companies	EDD on risk-based approach
76 u 76 v	Unregulated charities	Prohibited Prohibited
		EDD on risk-based approach
76 W	Used Car Dealers Virtual Asset Service Providers	Prohibited
76 x 76 y	Other (specify)	PROHIBITED: Traders of exotic an endangered animals/ entiries with PO Box domiciles / bearer shares companies
77	If restricted, provide details of the restriction	Restriction of: international wire transfers; transactions with third parties, local USD payments (SPID)
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for	
	onboarding entities that handle client money such as	Yes
	lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above	And the second s
01	Section are representative of all the LE's branches	Yes 🕌
81 a	If N, clarify which questions the difference/s relate to	N/A
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	N/A
	intermediate to the answers in this section.	
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	Yes
	reporting of suspicious activity?	
	What is the method used by the Entity to monitor	
84	transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what	N/A
04 a	type of transactions are monitored manually	11074
	1"	
0.4 %	If automated or combination selected, are Internal	Both
84 b	system or vendor-sourced tools used?	South State of the
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	ORACKE Oracle Financial Services Abalytucal Applications Anti-Money laundering (OFSAA)
	the name of the vendor/tool?	AML System (internal system)
0450	When we the test lest we take do	
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring	<1 year
	application last calibrated?	
85	Does the Entity have regulatory requirements to	Vac
	report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
00 a	processes to comply with suspicious transaction	Yes
	reporting requirements?	['
	Dec the Full bear all the second and	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
^=	Dan the Potter borne and the second	
87	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
	Door the Catity have processed in place to record	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities	Yes
	in a timely manner?	·
89	Does the Entity have processes in place to send	l
-	Requests for Information (RFIs) to their customers in	Yes Yes
	a timely manner?	
90	Confirm that all responses provided in the above	Yes
00.0	Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	N/A
91	If appropriate, provide any additional	N/A
	information/context to the answers in this section.	
24.242		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
	i ayment transparency standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
00 -	FATF Recommendation 16	Yes
93 a		
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Rules an Regulation applicable to Mexican payments systems in MXN and USD administrated by the Central Bank (SPEI - SPID), 16th Rule (DCG) pertaining to Article 115 of the Credit Institutions Law (LIC).
93 c	If N, explain	N/A
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	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
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
10 CANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
30	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
99	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
101	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:	
102 a1	Are internal system of vendor-sourced tools used?	Internal System
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	N/A
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 Question 110)	<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
<u> </u>	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:		HOST Topic
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	$\overline{\mathbf{T}}$
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	
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	$\overline{\mathbf{Y}}$
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)	Blocked Person List (from the Mexican Ministry of Finance - FIU) used for screening customer beneficial owners and for filtering transactional data. Shell companies list (Mexican Ministry of Finance SAT / Art 69 B); FBI; Interpol	and i
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
107 a	Customer Data	Same day to 2 business days	السنسا
107 b	Transactions	Same day to 2 business days	كسنسا
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	Y 16
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	V
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A	
110	If appropriate, provide any additional information/context to the answers in this section.	N/A	
11. TRAININ	G & EDUCATION		Salgin.
111	Does the Entity provide mandatory training, which includes:		
11 a	Identification and reporting of transactions to government authorities	Yes	Y
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	Y
111 e	Conduct and Culture	Yes	
111 f	Fraud	Yes	
112	Is the above mandatory training provided to:		7197
112 a	Board and Senior Committee Management	Yes	
12 b	1st Line of Defence	Yes	نسسا
12 c	2nd Line of Defence	Yes	Y
12 d	3rd Line of Defence	Yes	
12 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	$\overline{\mathbf{Y}}$
12 f	Non-employed workers (contractors/consultants)	No	
13	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	
14	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	
14 a			
1 1 - 1 - 0	If Y, how frequently is training delivered?	Annually	
15	If Y, how frequently is training delivered? Confirm that all responses provided in the above Section are representative of all the LE's branches	Annually Yes	

115 a		
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
116	If appropriate, provide any additional information/context to the answers in this section.	AML-CTF training is not provided to 3rd parties to wich specific FCC activities have been outsorced (a 112 e) because, by regulation, as providers of such services, they required certificaction in AML-CFT experts also certified by our regulator.
12 QUALITY	 Assurance /Compliance Testing	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
120	If appropriate, provide any additional information/context to the answers in this section.	N/A
13. AUDIT	I	
121	in addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component-based reviews
123 123 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
123 4	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes Yes
123	Other (specify)	Customer's file update
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
	If appropriate, provide any additional	N/A
126	information/context to the answers in this section.	
	Does the Entity have policies in place addressing fraud risk?	Yes V

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.	N/A
132	If appropriate, provide any additional information/context to the answers in this section.	N/A
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 Compilance Officer, Global Head of Financial Crimes Compilance OR equivalent)		
Banco Monex SA IBM Monex Grupo Financiero (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, Ricardo Vigueras Quin (Giobal 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.		
I, Marco Antonio Montiel Velazquez (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 Financial Institution. (Signature & Date)		

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