



Financial Institution Name:  
Location (Country):

EMRGO (DIFC) Ltd  
Dubai International Financial Centre, United Arab Emirates

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	EMRGO (DIFC) Ltd
2	Append a list of foreign branches which are covered by this questionnaire	None
3	Full Legal (Registered) Address	GA-00-SZ-L1-RT-208, Level 1, Gate Avenue, Dubai International Financial Centre, Dubai, PO Box 507211, United Arab Emirates
4	Full Primary Business Address (if different from above)	As above
5	Date of Entity incorporation/establishment	11/04/2019
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	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	Dimitrios Vourakis 35.79% Mohammed Alsehl 27.63%
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	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	
<b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes

11 g	Independent Testing	Yes	<input type="checkbox"/>
11 h	Periodic Review	Yes	<input checked="" type="checkbox"/>
11 i	Policies and Procedures	Yes	<input type="checkbox"/>
11 j	PEP Screening	Yes	<input checked="" type="checkbox"/>
11 k	Risk Assessment	Yes	<input type="checkbox"/>
11 l	Sanctions	Yes	<input checked="" type="checkbox"/>
11 m	Suspicious Activity Reporting	Yes	<input checked="" type="checkbox"/>
11 n	Training and Education	Yes	<input checked="" type="checkbox"/>
11 o	Transaction Monitoring	Yes	<input checked="" type="checkbox"/>
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes	<input type="checkbox"/>
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	<input type="checkbox"/>
13 a	If Y, provide further details		
14	Does the entity have a whistleblower policy?	Yes	<input type="checkbox"/>
<b>3. ANTI BRIBERY &amp; CORRUPTION</b>			
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	<input type="checkbox"/>
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="checkbox"/>
17	Does the Entity provide mandatory ABC training to:		
17 a	Board and Senior Committee Management	Yes	<input type="checkbox"/>
17 b	1st Line of Defence	Yes	<input checked="" type="checkbox"/>
17 c	2nd Line of Defence	Yes	<input type="checkbox"/>
17 d	3rd Line of Defence	Yes	<input type="checkbox"/>
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not applicable	<input type="checkbox"/>
17 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	<input type="checkbox"/>
<b>4. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>			
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
18 a	Money laundering	Yes	<input checked="" type="checkbox"/>
18 b	Terrorist financing	Yes	<input type="checkbox"/>
18 c	Sanctions violations	Yes	<input checked="" type="checkbox"/>
19	Does the Entity have policies and procedures that:		
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="checkbox"/>
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<input type="checkbox"/>
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="checkbox"/>
19 d	Prohibit accounts/relationships with shell banks	Yes	<input type="checkbox"/>
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	<input type="checkbox"/>
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="checkbox"/>
19 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	<input type="checkbox"/>
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="checkbox"/>
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	<input type="checkbox"/>
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	<input type="checkbox"/>

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="button" value="v"/>
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	<input type="button" value="v"/>
21 a	If Y, what is the retention period?	5 years or more	<input type="button" value="v"/>
<b>5. KYC, CDD and EDD</b>			
22	Does the Entity verify the identity of the customer?	Yes	<input type="button" value="v"/>
23	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	<input type="button" value="v"/>
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	<input type="button" value="v"/>
24 b	Expected activity	Yes	<input type="button" value="v"/>
24 c	Nature of business/employment	Yes	<input type="button" value="v"/>
24 d	Ownership structure	Yes	<input type="button" value="v"/>
24 e	Product usage	Yes	<input type="button" value="v"/>
24 f	Purpose and nature of relationship	Yes	<input type="button" value="v"/>
24 g	Source of funds	Yes	<input type="button" value="v"/>
24 h	Source of wealth	Yes	<input type="button" value="v"/>
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	<input type="button" value="v"/>
25 a1	Are ultimate beneficial owners verified?	Yes	<input type="button" value="v"/>
25 b	Authorised signatories (where applicable)	Yes	<input type="button" value="v"/>
25 c	Key controllers	Yes	<input type="button" value="v"/>
25 d	Other relevant parties	Yes	<input type="button" value="v"/>
26	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="button" value="v"/>
27	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	<input type="button" value="v"/>
28	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?	Please select	<input type="button" value="v"/>
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	<input type="button" value="v"/>
29 a	If yes, select all that apply:		
29 a1	Less than one year	No	<input type="button" value="v"/>
29 a2	1 – 2 years	Yes	<input type="button" value="v"/>
29 a3	3 – 4 years	Yes	<input type="button" value="v"/>
29 a4	5 years or more	No	<input type="button" value="v"/>
29 a5	Trigger-based or perpetual monitoring reviews	Yes	<input type="button" value="v"/>
29 a6	Other (please specify)		
30	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?		
30 a	Arms, Defence, Military	Do not have this category of customer or industry	<input type="button" value="v"/>
30 b	Respondent Banks	Do not have this category of customer or industry	<input type="button" value="v"/>
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select	
30 c	Embassies/Consulates	Do not have this category of customer or industry	<input type="button" value="v"/>
30 d	Extractive industries	Do not have this category of customer or industry	<input type="button" value="v"/>
30 e	Gambling customers	Prohibited	<input type="button" value="v"/>
30 f	General Trading Companies	EDD on risk-based approach	<input type="button" value="v"/>
30 g	Marijuana-related Entities	Prohibited	<input type="button" value="v"/>
30 h	MSB/MVTS customers	Do not have this category of customer or industry	<input type="button" value="v"/>
30 i	Non-account customers	Prohibited	<input type="button" value="v"/>
30 j	Non-Government Organisations	EDD on risk-based approach	<input type="button" value="v"/>
30 k	Non-resident customers	EDD on risk-based approach	<input type="button" value="v"/>

30 l	Nuclear power	Do not have this category of customer or industry	
30 m	Payment Service Providers	EDD on risk-based approach	
30 n	PEPs	Always subject to EDD	
30 o	PEP Close Associates	Always subject to EDD	
30 p	PEP Related	Always subject to EDD	
30 q	Precious metals and stones	EDD on risk-based approach	
30 r	Red light businesses/Adult entertainment	Prohibited	
30 s	Regulated charities	EDD on risk-based approach	
30 t	Shell banks	Prohibited	
30 u	Travel and Tour Companies	EDD on risk-based approach	
30 v	Unregulated charities	Prohibited	
30 w	Used Car Dealers	EDD on risk-based approach	
30 x	Virtual Asset Service Providers	EDD on risk-based approach	
30 y	Other (specify)		
31	If restricted, provide details of the restriction		
<b>6. MONITORING &amp; REPORTING</b>			
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
33 a	If manual or combination selected, specify what type of transactions are monitored manually	All transactions are subject to sample review as part of our routine monitoring.	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	
<b>7. PAYMENT TRANSPARENCY</b>			
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	
37 b	Local Regulations	Yes	
37 b1	If Y, Specify the regulation	Federal Law No. 20 of 2018 on AML and CFT and Illegal Organisations and Federal Law No. 7 of 2014 on Combating Terrorism Offences.  Article 70(3) of the DIFC Regulatory Law 2004 (the DFSA has jurisdiction for the regulation of AML in the DIFC) and the DFSA AML Rulebook.	
37 c	If N, explain		
<b>8. SANCTIONS</b>			
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes	
39	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	

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactions	
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactions	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactions	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactions	
41 e	Lists maintained by other G7 member countries	Please select	
41 f	Other (specify)	Any lists published by: - the government of the UAE or any government departments in the UAE - the Central Bank of the UAE or the FIU - UAE enforcement agencies - the DFSA	
42	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	
<b>9. TRAINING &amp; EDUCATION</b>			
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence	Yes	
44 c	2nd Line of Defence	Yes	
44 d	3rd Line of Defence	Yes	
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	
44 f	Non-employed workers (contractors/consultants)	Yes	
<b>10. AUDIT</b>			
45	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	
<p><b>Signature Page</b></p> <p>Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)</p> <p>EMRGO (DIFC) Ltd</p> <p>_____ (Financial Institution name)</p> <p>Stephen Lilley</p> <p>I, _____ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.</p> <p> _____ (Signature &amp; Date)</p>			