



Financial Institution Name:	Xconnect Trading Limited
Location (Country) :	United Kingdom

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Xconnect Trading Limited
2	Append a list of branches which are covered by this questionnaire	N/A
3	Full Legal (Registered) Address	8 Old Jewry, London, EC2R 8DN, United Kingdom
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation / establishment	25 June 2001
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No <input type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	No <input type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input type="checkbox"/>
6 d	Privately Owned	Yes <input type="checkbox"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Paul White
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 <input type="checkbox"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	











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

4. POLICIES & PROCEDURES		
15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
15 a	Money laundering	Yes
15 b	Terrorist financing	Yes
15 c	Sanctions violations	Yes
16	Does the Entity have policies and procedures that:	
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	No
16 d	Prohibit accounts / relationships with shell banks	Yes
16 e	Prohibit dealing with another Entity that provides services to shell banks	No
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
16 g	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
16 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
16 i	Define escalation processes for financial crime risk issues	Yes
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
18	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
18 a	If Y, what is the retention period?	5 years or more

5. KYC, CDD and EDD			
19	Does the Entity verify the identity of the customer?	Yes	▼
20	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes	▼
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
21 a	Ownership structure	Yes	▼
21 b	Customer identification	Yes	▼
21 c	Expected activity	Yes	▼
21 d	Nature of business / employment	Yes	▼
21 e	Product usage	Yes	▼
21 f	Purpose and nature of relationship	Yes	▼
21 g	Source of funds	Yes	▼
21 h	Source of wealth	Yes	▼
22	Are each of the following identified:		
22 a	Ultimate beneficial ownership	Yes	▼
22 a1	Are ultimate beneficial owners verified?	Yes	▼
22 b	Authorised signatories (where applicable)	Yes	▼
22 c	Key controllers	Yes	▼
22 d	Other relevant parties	Where applicable	
23	Does the due diligence process result in customers receiving a risk classification?	Yes	▼
24	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	▼
25	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	▼
26	Does the Entity have a process to review and update customer information based on:		
26 a	KYC renewal	Yes	▼
26 b	Trigger event	Yes	▼
27	From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?		
27 a	Non-account customers	EDD on a risk based approach	▼
27 b	Offshore customers	EDD on a risk based approach	▼

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27 c	Shell banks	Prohibited	▼
27 d	MVTS/ MSB customers	Prohibited	▼
27 e	PEPs	EDD on a risk based approach	▼
27 f	PEP Related	EDD on a risk based approach	▼
27 g	PEP Close Associate	EDD on a risk based approach	▼
27 h	Correspondent Banks	Prohibited	▼
27 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?		▼
27 i	Arms, defense, military	Prohibited	▼
27 j	Atomic power	Prohibited	▼
27 k	Extractive industries	Prohibited	▼
27 l	Precious metals and stones	Prohibited	▼
27 m	Unregulated charities	Prohibited	▼
27 n	Regulated charities	Prohibited	▼
27 o	Red light business / Adult entertainment	Prohibited	▼
27 p	Non-Government Organisations	Prohibited	▼
27 q	Virtual currencies	Prohibited	▼
27 r	Marijuana	Prohibited	▼
27 s	Embassies / Consulates	Prohibited	▼
27 t	Gambling	Prohibited	▼
27 u	Payment Service Provider	Prohibited	▼
27 v	Other (specify)		
28	If restricted, provide details of the restriction		

6. MONITORING & REPORTING			
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
30	What is the method used by the Entity to monitor transactions for suspicious activities?		
30 a	Automated	Yes	
30 b	Manual	Yes	
30 c	Combination of automated and manual	Yes	
31	Does the Entity have regulatory requirements to report currency transactions?	No	
31 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	No	
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	
7. PAYMENT TRANSPARENCY			
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:		
34 a	FATF Recommendation 16	Yes	
34 b	Local Regulations	Yes	
34 b1	Specify the regulation	FCA UK	
34 c	If N, explain		

8. SANCTIONS		
35	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions?	Yes
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
37 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
37 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
37 e	Other (specify)	
38	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAINING & EDUCATION		
39	Does the Entity provide mandatory training, which includes :	
39 a	Identification and reporting of transactions to government authorities	Yes
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
39 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
40	Is the above mandatory training provided to :	
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. AUDIT		
41	In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes