## the Wolfsberg Group

Financial Institution Name: Location (Country): BlackRock, Inc. GLOBAL

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	BlackRock, Inc.
		(This questionnaire applies to BlackRock, Inc. and its subsidiaries ("BlackRock")
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	C/O THE CORPORATION TRUST COMPANY Corporation Trust Center 1209 Orange Street, Wilmington, DE 19801   United States
4	Full Primary Business Address (if different from above)	50 Hudson Yards New York, NY 10001 United States
5	Date of Entity incorporation/establishment	1988
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	NYSE: BLK
6 b	Member Owned/Mutual	No 🗔
6 c	Government or State Owned by 25% or more	No I
6 d	Privately Owned	No $\square$
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
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	
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	529900VBK42Y5HHRMD23
	FF & SANCTIONS PROGRAMME	
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	Not Applicable
		1)/
11 e 11 f	CDD EDD	Yes Yes

11   Pelnode Revew   Yes   11   Pelnode and Procedures   Yes   11   Pelnos and Procedures   Yes   11   Pelnos and Procedures   Yes   12   Yes   13   Yes   14   R. Risk Assessment   Yes   15   Yes   16   Yes   17   Yes   17   Yes   18   Yes   19   Yes   19   Yes   19   Yes   10   Yes   10   Yes   10   Yes   10   Yes   10   Training and Education   Yes   10   Yes   10   Training and Education   Yes   10   Yes   Yes   Yes   10   Yes   Yes   Yes   10   Yes   Y		1	I	
Process and Procedures   Yes	11 g	Independent Testing	Yes	
11   PEP Scroening   Vas		Periodic Review	Yes	
11 II Secretary 11 II Supplicious Activity Reporting		Policies and Procedures	Yes	
11 m Sanctions Activity Reporting Ves 11 n Training and Education Ves 11 n Training and Education Ves 12 n Training and Education Ves 12 n Training and Education Ves 12 n the Entity's AMIL, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?  13 Does the Entity and the Board or equivalent Senior Management Committee?  13 Description of its AMIL, CTF & Sanctions programme?  13 Description of its AMIL, CTF & Sanctions programme?  13 Description of its AMIL, CTF & Sanctions programme?  14 Description of its AMIL, CTF & Sanctions programme?  15 Description of its AMIL, CTF & Sanctions programme?  16 Description of its AMIL CTF & Sanctions of programme?  17 Description of its AMIL CTF & Sanctions of programme?  18 As the Entity documented notices and procedures consistent with applicable AMC requisitions and requirements to reasonably prevent, detect and report bribery and corruption?  16 Does the Entity provide mandatory ABC training to Procedures?  17 Description of the Sanctions of Procedures of Procedures?  18 Description of Sanctions of Procedures of Procedures of Procedures?  19 Description of Procedures of Procedures of Procedures of Procedures of Procedures?  19 Description of Procedures of Procedure	11 j	PEP Screening	Yes	_
Tin Training and Education	11 k	Risk Assessment	Yes	
11 n Treaning and Education	11 I	Sanctions	Yes	V
Training and Education   Ves	11 m	Suspicious Activity Reporting	Yes	V
Transaction Montoring   Ves	11 n		Yes	
Is the Entity's AMIL, CTF & Sanctions policy approved a least amnually by the Barard or equivalent Senior Management Committee?   Ves		· · · · · · · · · · · · · · · · · · ·	_	V
af losat annually by the Board or equivalent Senior Management Committed?  13 a Does the Entity use third parties to carry out any programme?  14 Ty, provide further details  15 a If Y, provide further details  16 A Does the entity have a whistleticever policy?  27 A ANTI BRIBERY & CORRUPTION  18 the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report behavior and an analysis of the processor and requirements to treat the processor and an analysis of the processor and requirements to treat the processor and the processor		·	les	
components of its AML, CTF & Sanctions by programme?  13 a		at least annually by the Board or equivalent Senior	Yes	<b>•</b>
parties (such as for its find business, transfer agents may administer BlackRock funds including conducting customer due diligence) to carry out specified Aklf. functions.  15	13	components of its AML, CTF & Sanctions	Yes	•
3. ANTI BRIBERY & CORRUPTION  15	13 a	If Y, provide further details	parties (such as for its fund business, transfer agents may administer BlackRock funds including conducting customer due diligence) to carry or	
15. ANTI BRIBERY & CORRUPTION 15. Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 16. Does the Entity provide mandatory ABC Policies and Procedures? 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity provide mandatory ABC training to: 17. Does the Entity and the Entity document of the Entity and	14	Does the entity have a whistleblower policy?	Yes	
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  17 Does the Entity provide mandatory ABC training to: 17 a Board and Senior Committee Management Yes 17 b Ist Line of Defence Yes 17 c Internal Section of Defence Yes 17 d Sird Line of Defence Yes 18 d Line of Defence Yes 19 d Non-employed workers as appropriate (contractors/consultants) 19 d Non-employed workers as appropriate (contractors/consultants) 18 d Line Stee 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 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unlicensed banks and fulfillous hands and roll-gible banks 19 d Prohibit dealing with other entities that provide banks yes 19 d Prohibit dealing with another Entity that provides banks yes 19 d Prohibit dealing with another Entity that provides and foreign PEPs, including their family and close associates or more years, case de cardination and foreign PEPs, including their family and close associates or more years, case de cardinates and foreign PEPs, including their family and close associates or more years, case de cardinates and foreign PEPs, including their family and close associates and foreign PEPs, including their family and close associates and foreign PEPs, including their family and close associates and foreign PEPs, including their family and close associates and foreign PEPs, and Adverse Media/Negative Yes	3. ANTI		<u> </u>	
consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  17 Does the Entity provide mandatory ABC training to:  17 a Board and Sanior Committee Management Yes  17 b Ist Line of Defence Yes  17 d Jard Line of Defence Yes  17 d Sird Line of Defence Yes  17 d Sird Line of Defence Yes  17 d Sird Line of Defence Yes  17 d Non-employed workers as appropriate contractors/consultants)  17 f Non-employed workers as appropriate constanting to contractors/consultants)  4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  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  18 b Terrorist financing Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 a Prohibit dealing with other entities that provide banks and/or NBFIs  19 a Prohibit dealing with another Entity that provides banks services to shell banks  19 a Prohibit depening and keeping of accounts for unlicensed banks and/or NBFIs  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designated entities  19 a Prohibit depening and keeping of accounts for Section 311 designa				_
Independent third party cover ABC Policies and Procedures?  17 Does the Entity provide mandatory ABC training to:  18 Board and Senior Committee Management  19 Ses		consistent with applicable ABC regulations and requirements to reasonably prevent, detect and	Yes	•
17 a   Board and Senior Committee Management   Yes   Tr b   1st Line of Defence   Yes   Tr c   2nd Line of Defence   Yes   Tr d   2nd Line of Defence   Yes   Tr d   3rd Line of Defence   Yes   Tr d   Yes   Yes   T	16	independent third party cover ABC Policies and	Yes	•
17 a   Board and Senior Committee Management   Yes   To   1st Line of Defence   Yes   To   2nd Line of Defence   Yes   To   2nd Line of Defence   Yes   To   2nd Line of Defence   Yes   To   3rd Line of Defence   Yes   To   3rd Line of Defence   Yes   To   4   3rd Line of Defence   To	17	Does the Entity provide mandatory ABC training to:		
17 b 1st Line of Defence Yes 17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 17 f Non-employed workers as appropriate (contractors/consultants)  4. AML, CTF & SANCTIONS POLICIES & PROCEDURES  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 18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 a Prohibit the opening and keeping of accounts for unicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit dealing with other entities that provides services to shell banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for any of unlicensed bank and the entitiance agents, exchanges houses, case de cambio, bureaux de change or money transfer agents 19 f Prohibit opening and keeping of accounts for any of unlicensed bank and the entitiance agents, exchanges houses, case de cambio, bureaux de change or money transfer agents 19 f Define the process for escalating financial crime risk is sussipotentially suspicious activity identified by employees 19 outtine the processes regarding screening for sanctions, PEPs and Adverse Media/Negative			Yes	
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17 d 3rd Line of Defence			_	
Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  Non-employed workers as appropriate (contractors/consultants)  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 Yes Sanctions regulations and requirements to reasonably prevent, detect and report:  18 b Terrorist financing Yes Yes Sanctions violations Yes Sanctions with applicable AML, CTF & Sanctions Yes Sanctions violations Yes Sanctions with the opening and keeping of anonymous and fictitious named accounts for unlicensed banks and/or NBFIs Yes Prohibit detailing with other entities that provide banking services to unlicensed banks and/or NBFIs Yes Sanctions Yes Saction 311 designated entities Sanctions Yes Saction 311 designated entities Yes Prohibit dealing with anorther Entity that provides services to shell banks Yes Yes Saction 311 designated entities Yes Prohibit dentities Yes Saction 311 designated entities Yes Yes Yes Saction 311 designated entities Yes Yes Yes Y			_	
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### Contractors/consultants)  ### A.AML, CTF & SANCTIONS POLICIES & PROCEDURES  ### Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report.  ### Money laundering  ### Wes  ### Noney laundering  ### Yes  ### Does the Entity have policies and procedures that:  ### 19			No	▼
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a	17 f		Yes	▼
consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  18 a	4. AML,	CTF & SANCTIONS POLICIES & PROCEDURES		
18 b Terrorist financing Yes  18 c Sanctions violations Yes  19 Does the Entity have policies and procedures that:  19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  19 d Prohibit accounts/relationships with shell banks  19 e Prohibit dealing with another Entity that provides services to shell banks  19 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  19 j Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	18	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,		
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19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	18 b	Terrorist financing	Yes	
19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  19 d Prohibit decounts/relationships with shell banks  19 e Prohibit dealing with another Entity that provides services to shell banks  19 f Prohibit opening and keeping of accounts for Section 311 designated entities  19 g Prohibit opening and keeping of accounts for Section 311 designated entities  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  19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	18 c	Sanctions violations	Yes	V
19 a Prohibit the opening and keeping of anonymous and fictitious named accounts  19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  19 d Prohibit accounts/relationships with shell banks  19 e Prohibit dealing with another Entity that provides services to shell banks  19 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	19			
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19 c Prohibit dealing with other entities that provide banking services to unlicensed banks  19 d Prohibit accounts/relationships with shell banks  19 e Prohibit dealing with another Entity that provides services to shell banks  19 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative  Yes	19 b	Prohibit the opening and keeping of accounts for	Yes	<u></u>
19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative  Yes  Yes  Yes  Yes	19 с	Prohibit dealing with other entities that provide	Yes	<u></u>
19 e Prohibit dealing with another Entity that provides services to shell banks  19 f Prohibit opening and keeping of accounts for Section 311 designated entities  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  19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative  Yes	19 d	-	Yes	
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foreign PEPs, including their family and close associates  19 i  Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  19 j  Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative  Yes  Yes	19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes	•
risk issues/potentially suspicious activity identified by employees  19 j  Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative  Yes  Yes		foreign PEPs, including their family and close	Yes	•
sanctions, PEPs and Adverse Media/Negative Yes		risk issues/potentially suspicious activity identified	Yes	•
	19 j		Yes	•

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	•
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	lacksquare
21 a	If Y, what is the retention period?	5 years or more	•
E KVC (	DDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes	
23		165	$\equiv$
	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	•
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	
24 b	Expected activity	Yes	
24 с	Nature of business/employment	Yes	
24 d	Ownership structure	Yes	
24 e	Product usage	Yes	V
24 f	Purpose and nature of relationship	Yes	
24 g	Source of funds	Yes L.	
24 h	Source of wealth	Yes	
25	Are each of the following identified:	W.	
25 a	Ultimate beneficial ownership	Yes	
25 a1	Are ultimate beneficial owners verified?	Yes	
25 b	Authorised signatories (where applicable)	Yes	
25 c	Key controllers	Yes	
25 d	Other relevant parties	Yes	
26	Does the due diligence process result in customers receiving a risk classification?	Yes	•
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	•
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?	Yes	•
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	lacksquare
29 a	If yes, select all that apply:		
29 a1	Less than one year	No	
29 a2	1 – 2 years	Yes	
29 a3	3 – 4 years	Yes	
29 a4	5 years or more	Yes	
29 a5	Trigger-based or perpetual monitoring reviews	Yes	
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	EDD on risk-based approach	
30 b	Respondent Banks	Do not have this category of customer or industry	
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the	Yes	•
	Wolfsberg Correspondent Banking Principles 2022?		
30 с	Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates	EDD on risk-based approach	V
30 c 30 d		EDD on risk-based approach EDD on risk-based approach	
	Embassies/Consulates Extractive industries	EDD on risk-based approach	V
30 d 30 e	Embassies/Consulates Extractive industries Gambling customers	EDD on risk-based approach EDD on risk-based approach	V
30 d 30 e 30 f	Embassies/Consulates Extractive industries Gambling customers General Trading Companies	EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach	<b>T</b>
30 d 30 e 30 f 30 g	Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach	<b>Y</b>
30 d 30 e 30 f 30 g 30 h	Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	EDD on risk-based approach	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
30 d 30 e 30 f 30 g 30 h 30 i	Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	EDD on risk-based approach Prohibited	\ \ \ \ \ \
30 d 30 e 30 f 30 g 30 h	Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	EDD on risk-based approach	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \

30 I	Nuclear power	EDD on risk-based approach	
30 m	Payment Service Providers	EDD on risk-based approach	
30 n	PEPs	EDD on risk-based approach	
30 o	PEP Close Associates	EDD on risk-based approach	V
30 p	PEP Related	EDD on risk-based approach	V
30 q	Precious metals and stones	EDD on risk-based approach	V
30 r	Red light businesses/Adult entertainment	EDD on risk-based approach	
30 s	Regulated charities	EDD on risk-based approach	$\blacksquare$
30 t	Shell banks	Prohibited	
30 u	Travel and Tour Companies	EDD on risk-based approach	
30 v	Unregulated charities	EDD on risk-based approach	V
30 w	Used Car Dealers	EDD on risk-based approach	▼1
30 x	Virtual Asset Service Providers	EDD on risk-based approach	V
30 y	Other (specify)		
31	If restricted, provide details of the restriction	The above-listed categories of customers or industries may be subject t additional due diligence and/or customer selection and approval proces EDD and restrictions may vary by jurisdiction in accordance with local la and can be assessed on a case-by-case basis.	s.
6. MONIT	FORING & REPORTING		
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	lacksquare
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Suspicious activities reported by employees, business divisions and tratagents are registered in the internal Transaction Surveillance and Suspicious activity screening tool but are monitored manually.	nsfer
34	Does the Entity have regulat ory 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	•
7. PAYM	ENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select	<b>~</b>
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	Please select	
37 b	Local Regulations	Please select	
37 b1	If Y, Specify the regulation		
37 с	If N, explain	BlackRock Inc. is a global asset manager and as such it does not perfo payment activities. All payments are performed by a custodian bank pursuant to their payment standards and requirements.	rm
8. SANC	TIONS		
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 tran	•
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 tran	•
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering tran	•
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tran	
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering tran	
41 f	Other (specify)	Osed for screening customers and beneficial owners and for intening train	_
		In relation to question 41e, BlackRock takes reasonable steps to ensure that it does not accept or maintain relationships with any sanctioned per or entity named on lists published by some of the G7 member countries well as other bodies relevant to the jurisdictions in which BlackRock operates	son
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	•
9. TRAIN	ING & EDUCATION		
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 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	lacksquare
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	<b>V</b>
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence	Yes	V
44 c	2nd Line of Defence	Yes	V
44 d	3rd Line of Defence	Yes	V
44 e	Third parties to which specific FCC activities have been outsourced	Yes	•
44 f	Non-employed workers (contractors/consultants)	Yes	V
10. AUDI	1 2 2		
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	•
Signature P Wolfsberg G BlackRock, I	roup Financial Crime Compliance Questionnaire 2023 (FCCQ	V1.2) (Financial Institution name)	
I, John Mack understood t declaration, t		pliance Manager- Second Line representative), certify that I have read ar	nd
December 1	16, 2024		
	lackessy (Signature &	Date)	
		,	