



Financial Institution Name:  
Location (Country) :

Royal Bank of Canada  
Canada

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
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Royal Bank of Canada
2	Append a list of foreign branches which are covered by this questionnaire	All branches. See Appendix 1 for a list of Royal Bank of Canada branches.
3	Full Legal (Registered) Address	1 Place Ville-Marie, Montreal, Quebec, H3B 3A9 Canada
4	Full Primary Business Address (if different from above)	200 Bay Street, Royal Bank Plaza, Toronto, ON, M5J 2J5, Canada
5	Date of Entity incorporation/establishment	June 22, 1869
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	Toronto Stock Exchange and New York Stock Exchange. Ticker: RY
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
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)?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	RBC Cayman Island Branch
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	Office of the Superintendent of Financial Institutions (OSFI) Canada and The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)
11	Provide Legal Entity Identifier (LEI) if available	ES7IP3U3RHIGC71XBU11
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Royal Bank of Canada is the parent.

13	Jurisdiction of licensing authority and regulator of ultimate parent	See Q10 comment.
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	RBC is one of North America's leading diversified financial services companies, and provide personal and commercial banking, wealth management, insurance, investor services and capital markets products and services on a global basis.
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	10001+
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.	No
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See Appendix 1 for a list of branches of the Royal Bank of Canada and their related business segment. Not all branches offer business areas listed in question 14. For example, a Capital Markets unit will not offer retail banking
18	If appropriate, provide any additional information/context to the answers in this section.	-
<b>2. PRODUCTS &amp; SERVICES</b>		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Yes
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSS)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSS, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSS	No
19 a1h3	PSPs	No

19 a1l	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs/MVTs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	Yes
19 g	Low Price Securities	Yes
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	-
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	Yes
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
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	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	N/A
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	N/A
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Identification and verification
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	#19 p1: In Canada, retail financial institutions have a regulatory obligation to cash Government of Canada cheques under \$1,750 CAD for non-clients with one piece of acceptable identification. #19 p3: Non client can only get foreign currency exchange potentially through ATMs using their FIs debit/credit card. The branches do not accept foreign currency cash from non-clients. #19 p4: In Canada, RBC draft can be cashed for non-client up to \$2,999.99 Canadian equivalent cumulative transaction total.
19 q	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.	No
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	See Appendix 1 for a list of branches of the Royal Bank of Canada and their related business segment. Not all branches offer business areas listed in question 13. For example, a Capital Markets unit will not offer Private Banking.
21	If appropriate, provide any additional information/context to the answers in this section.	#19 a1e: RBC Canada may offer this in narrow circumstances and only after an Enhanced Due Diligence review is conducted on both the applicant entity and the downstream activity, and both are found to be satisfactory. Transactions must be fully transparent and include all parties to the transaction.  #19 a1e: Applicable to Canada only.
<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 l	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Over 500
24	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.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	N/A
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
29	If appropriate, provide any additional information/context to the answers in this section.	#23: RBC has approximately 1,000 employees in the AML, CTF & Sanctions Compliance department Enterprise wide. #25: Quarterly #26: Royal Bank of Canada does not outsource Financial Crimes compliance activities. #28 Note - The AML, CTF, and Sanctions program is applicable enterprise-wide, including all Royal Bank of Canada branches and subsidiaries.
<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	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)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	N/A
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	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:	
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
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.	Note – The ABC program is applicable enterprise-wide, including Royal Bank of Canada branches and subsidiaries.
45	If appropriate, provide any additional information/context to the answers in this section.	#42e. RBC does not outsource compliance activities subject to ABC risk.
<b>5. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>		
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
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	No
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	No
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 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
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	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
49 l	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.	Q47 - Entity policies are updated on an annual basis. Entity procedures and other like document types are updated within a three year cycle or earlier, as required. Q49c - This prohibition will be expressly included in the next policy update. Should RBC identify another entity is providing banking services to unlicensed banks, this will be escalated for further review.
<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	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	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	No
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	The EWRA is completed annually. We have transformed the AML & CTF EWRA and are in the final stages of completing the exercise. The enhanced version will be updated by May 2025.
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	No
59 a	If N, provide the date when the last Sanctions EWRA was completed.	The EWRA is completed annually. We have transformed the Sanctions EWRA and are in the final stages of completing the exercise. The enhanced version will be updated by May 2025.
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
61	If appropriate, provide any additional information/context to the answers in this section.	-
<b>7. KYC, CDD and EDD</b>		
62	Does the Entity verify the identity of the customer?	Yes
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
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
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	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:	
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
67 a6	Other (specify)	We may use supplemental criteria in assessing risk ratings where applicable.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
68 a4	Other	No
68 a4a	If yes, please specify "Other"	-
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?	Combination of automated and manual
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?	Yes
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:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	-
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	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
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	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	EDD on risk-based approach
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 l	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	# 76a: RBC prohibits onboarding companies that design, manufacture, export or sell chemical or biological weapons, anti-personnel landmines or cluster munitions, or critical components thereof. #76e: Internet Gambling is prohibited. #76g: Canadian licensed only. #76h: Applicable to Canada only. Must be registered with FINTRAC with physical location in Canada and serve clients in Canada. Review of AML program and senior management approval is required. #76k: Appropriate connection to Canada required. #76r: Legal only
77	If restricted, provide details of the restriction	-
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 lawyers, accountants, consultants, real estate agents?	Yes
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 Section are representative of all the LE's branches	No
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	The above responses reflect the Enterprise risk appetite with regards to these client types. Where local law prohibits dealing with such client types, the local law is followed. Additionally, branches may implement restrictions beyond risk appetite.
82	If appropriate, provide any additional information/context to the answers in this section.	#64g and 64h: Source of funds and source of wealth are collected for high-risk clients. For Capital Markets, general retail and commercial clients, this information is collected as applicable and/or as required. #65d: All relevant parties are subject to COO, as specified in regulations and in RBC policy. #66: The threshold for determining beneficial ownership of corporation and other entities is 25% in Canada's Proceed of Crime (Money Laundering) and Terrorist Financing Act/Regulations. As such, 25% is the Enterprise standard. However, where regulations in local jurisdictions require a lower threshold, local requirements apply. #70: Adverse media/negative news scanning is performed. Resulting alerts are reviewed and escalated if required.
<b>8. MONITORING &amp; REPORTING</b>		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Transaction monitoring is automated. In addition, manual Unusual Transaction Reports (UTRs) are submitted by RBC staff.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	-
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	-
91	If appropriate, provide any additional information/context to the answers in this section.	#84b: Internally built in Statistical Analysis Software (SAS) or internally built using Python.
<b>9. PAYMENT TRANSPARENCY</b>		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	All applicable regulations depending on jurisdiction.
93 c	If N, explain	-
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.	-
97	If appropriate, provide any additional information/context to the answers in this section.	-
<b>10. SANCTIONS</b>		
98	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
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 or vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	RBC's client screening core matching engine is IBM's Global Name Matching software which has been configured by RBC.
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
104	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:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
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 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
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)	G7 member countries lists and other sanctions lists are deployed for branches and subsidiaries per applicable laws in local jurisdictions.
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
107 b	Transactions	Same day to 2 business days
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
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
110	If appropriate, provide any additional information/context to the answers in this section.	-
<b>11. TRAINING &amp; EDUCATION</b>		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
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
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
116	If appropriate, provide any additional information/context to the answers in this section.	#112a: RBC does not outsource financial crimes compliance activities. #114a: Financial Crimes employees are provided specialized training on an ongoing basis.
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
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.	-
120	If appropriate, provide any additional information/context to the answers in this section.	-
<b>13. AUDIT</b>		
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	Component-based reviews
122 b	External Third Party	Component-based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	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	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	-
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.	-
126	If appropriate, provide any additional information/context to the answers in this section.	-
<b>14. FRAUD</b>		
127	Does the Entity have policies in place addressing fraud risk?	
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	

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	No
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Please refer to the Q132 comment.
132	If appropriate, provide any additional information/context to the answers in this section.	<p>#127: The Policy and Standard is Enterprise-wide.</p> <p>#128: For business segment Insurance - Yes, strategist plus a small group in Claims and in CIS that work 'alerts'; For business segments CM, I&amp;TS and WM - Yes, strategist plus business/business risk groups are COE's for fraud risk; For business segment P&amp;CB - Yes, there is a dedicated group in Fraud Management Operations.</p> <p>#129: For business segment Insurance - No, but not applicable to Insurance fraud</p> <p>For business segments CM, I&amp;TS and WM - Business level controls within the business/business risk groups.</p> <p>For business segment P&amp;CB - Yes, there is a dedicated group in Fraud Management Operations.</p> <p>#130: For business segment Insurance - Yes. Data is focused on Claims red flag data points e.g. claim relative duration; For business segment P&amp;CB - Yes, there is a dedicated group in Fraud Management Operations</p> <p>#131: For business segments Insurance, CM, I&amp;TS, WM businesses - No</p> <p>For business segment P&amp;CB - Yes, there is a dedicated group in Fraud Management Operations</p> <p>#131a: Question 131 Applies to disability insurance only.</p>

### 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 Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

Royal Bank of Canada (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.

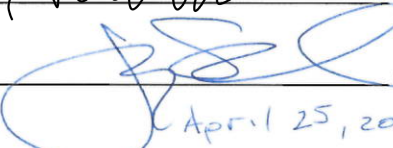
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, James Rausch (Global 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, Jay Stark (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.

 April 28, 2025 (Signature & Date)

 April 25, 2025 (Signature & Date)

## Appendix 1: Branches of the Royal Bank of Canada

Branches & Locations	Street Address at which Branch Maintains a Place of Business	Country	Banking Authority	Physical Presence	Business Segment
<b>Royal Bank of Canada Sydney Branch</b>	Level 47, 2 Park Street, Sydney, N.S.W., 2000	Australia	Australian Prudential Regulation Authority; Australian Transaction Reports and Analysis Centre; Australian Securities and Investments Commission; Office of the Superintendent of Financial Institutions (Canada)	Yes	CM
<b>Royal Bank of Canada Toronto Branch</b>	200 Bay Street, Toronto, Ontario	Canada	Office of the Superintendent of Financial Institutions (Canada)	Yes	All
<b>Royal Bank of Canada London Branch</b>	100 Bishopsgate, London, EC2N 4AA	United Kingdom	Financial Conduct Authority (UK); Prudential Regulatory Authority (UK); Office of the Superintendent of Financial Institutions (Canada)	Yes	CM & WM
<b>Royal Bank of Canada Cayman Island Branch</b>	24 Shedden Road, PO Box 245 George Town KY 1-1104 Grand Cayman	Cayman Islands	Cayman Islands Monetary Authority	Yes	PB & CB
<b>Royal Bank of Canada Hong Kong Branch</b>	41/F & 42/F, One Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong	Hong Kong	Hong Kong Monetary Authority; Office of the Superintendent of Financial Institutions (Canada)	Yes	CM & WM
<b>Royal Bank of Canada Tokyo Branch</b>	Akasaka Intercity AIR 8F, 1-8-1, Akasaka, Minato-ku, Tokyo, 107-0052	Japan	Japan Financial Services Agency; Office of the Superintendent of Financial Institutions (Canada)	Yes	CM
<b>Royal Bank of Canada Singapore Branch</b>	8 Marina View #26-01 Asia Square Tower 1, Singapore, 018960	Singapore	Monetary Authority of Singapore; Office of the Superintendent of Financial Institutions (Canada)	Yes	CM & WM

### Business Segment Legend:

PB – Personal Banking, CB - Commercial Banking, WM – Wealth Management, CM – Capital Markets

## Appendix 1: Branches of the Royal Bank of Canada

Branches & Locations	Street Address at which Branch Maintains a Place of Business	Country	Banking Authority	Physical Presence	Business Segment
<b>Royal Bank of Canada Paris Branch</b>	58 avenue Marceau 75008, Paris	France	Autorité de contrôle prudentiel et de resolution (French Prudential Supervision and Resolution Authority); Autorité des marchés financiers (AMF); Office of the Superintendent of Financial Institutions (Canada)	Yes	CM
<b>Royal Bank of Canada Beijing Branch</b>	Suite 921, Winland International Financial Center No. 7 Finance Street Xi Cheng District, Beijing, 100033 P.R.China	China	People's Bank of China; China Banking and Insurance Regulatory Commission; State Administration of Foreign Exchange; Office of the Superintendent of Financial Institutions (Canada)	Yes	CM
<b>Royal Bank of Canada Bahamas Branch</b>	2nd Floor, Albany Financial Centre South Ocean Boulevard P.O. Box N-7549 Nassau, Bahamas	Bahamas	Central Bank of the Bahamas; Office of the Superintendent of Financial Institutions (Canada)	Yes	CM
<b>Royal Bank of Canada New York Branches</b>	<b>Three World Financial Center Branch Capital Markets</b> 200 Vesey Street, Three World Financial Center, New York, NY 10281  <b>1211 Avenue of the Americas Branch Wealth Management</b> 1211 Avenue of the Americas, New York, NY 10036	United States of America	Office of the Comptroller of the Currency; Board of Governors of the Federal Reserve System	Yes	CM & WM
<b>Royal Bank of Canada Barbados Branch</b>	Building No. 1, Chelston Park, Collymore Rock, St. Michael Barbados	Barbados	Central Bank of Barbados	Yes	PB & CB

### Business Segment Legend:

PB – Personal Banking, CB - Commercial Banking, WM – Wealth Management, CM – Capital Markets



## Appendix 1: Branches of the Royal Bank of Canada

### About Royal Bank of Canada

Royal Bank of Canada is a global financial institution with a purpose-driven, principles-led approach to delivering leading performance. Our success comes from the 98,000+ employees who leverage their imaginations and insights to bring our vision, values and strategy to life so we can help our clients thrive and communities prosper. As Canada's biggest bank and one of the largest in the world, based on market capitalization, we have a diversified business model with a focus on innovation and providing exceptional experiences to our more than 18 million clients in Canada, the U.S. and 27 other countries. Learn more at [rbc.com](https://www.rbc.com).

Effective the fourth quarter of 2024, the Personal & Commercial Banking segment became two standalone business segments: Personal Banking and Commercial Banking. With this change, RBC Direct Investing moved from the previous Personal & Commercial Banking segment to the Wealth Management segment. Comparative results in this MD&A have been revised to conform to our new basis of segment presentation.

Our business segments are described below.

<b>Personal Banking</b>	Provides a broad suite of financial products and services to retail clients in Canada, the Caribbean and the U.S. Our commitment to building and maintaining deep and meaningful relationships with our clients is underscored by the delivery of exceptional client experiences, the breadth of our product suite, our depth of expertise and the features of our digital solutions.
<b>Commercial Banking</b>	Offers a wide range of lending, deposit and transaction banking products and services to Canadian companies and foreign businesses in Canada. Our team of relationship managers and specialists serves the full lifecycle of commercial clients, from entrepreneurs and mid-market enterprises to the largest Canadian privately owned companies, public corporations and Canadian subsidiaries of global multinationals.
<b>Wealth Management</b>	Primarily serves affluent, high net worth (HNW) and ultra-high net worth (UHNW) clients from our offices in key financial centres across the globe. We offer a comprehensive suite of wealth, investment, trust, banking, credit and other solutions to this client segment. We also provide a self-directed investment service in Canada, as well as asset management products globally to institutional and individual clients through our distribution channels and third-party distributors. We offer asset services and investor services to financial institutions, asset managers and asset owners in Canada.
<b>Insurance</b>	Offers a comprehensive suite of advice and solutions for individual and business clients including life, health, wealth solutions, property & casualty, travel, group benefits, longevity reinsurance and reinsurance. We provide tailored, client-led advice and solutions, harnessing the power of technology and data and leveraging the strength and scale of the RBC enterprise as our competitive advantage.
<b>Capital Markets</b>	Provides expertise in advisory & origination, sales & trading, lending & financing and transaction banking to corporations, institutional clients, asset managers, private equity firms and governments globally. We serve clients from 58 offices in 16 countries across North America, the U.K. & Europe, Australia, Asia and other regions.

### Business Segment Legend:

PB – Personal Banking, CB - Commercial Banking, WM – Wealth Management, CM – Capital Markets