

# the Wolfsberg Group

Financial Institution Name:  
Location (Country):

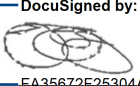
ALCENTRA LIMITED  
United Kingdom

| No #   | Question  | Answer  |
|--|---|---|
| <b>1. ENTITY &amp; OWNERSHIP</b>             |   |   |
| 1  | Full Legal name   | ALCENTRA LIMITED  |
| 2  | Append a list of foreign branches which are covered by this questionnaire   | N/A   |
| 3  | Full Legal (Registered) Address   | Cannon Place<br>78 Cannon Place<br>London EC4N 6HL  |
| 4  | Full Primary Business Address (if different from above)   | As above  |
| 5  | Date of Entity incorporation/establishment  | 12 August 1994  |
| 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   | N/A   |
| 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                       | Alcentra Limited is a wholly owned subsidiary of Franklin Resources Inc., the holding company for the various subsidiaries that form the global Investment management organization known as Franklin Templeton. |
| 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   | N/A   |
| 9  | Does the Bank have a Virtual Bank License or provide services only through online channels?                             | No <input type="checkbox"/>   |
| 10   | Provide Legal Entity Identifier (LEI) if available  | N/A   |
| <b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b> |   |   |
| 11   | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: |   |
| 11 a   | Appointed Officer with sufficient experience/expertise  | Yes <input type="checkbox"/>  |
| 11 b   | Adverse Information Screening   | Yes <input type="checkbox"/>  |
| 11 c   | Beneficial Ownership  | Yes <input type="checkbox"/>  |
| 11 d   | Cash Reporting  | Yes <input type="checkbox"/>  |
| 11 e   | CDD   | Yes <input type="checkbox"/>  |
| 11 f   | EDD   | Yes <input type="checkbox"/>  |

|  |  |     |                          |
|--|--|-----|--------------------------|
| 11 g   | Independent Testing  | Yes | <input type="checkbox"/> |
| 11 h   | Periodic Review  | Yes | <input type="checkbox"/> |
| 11 i   | Policies and Procedures  | Yes | <input type="checkbox"/> |
| 11 j   | PEP Screening  | Yes | <input type="checkbox"/> |
| 11 k   | Risk Assessment  | Yes | <input type="checkbox"/> |
| 11 l   | Sanctions  | Yes | <input type="checkbox"/> |
| 11 m   | Suspicious Activity Reporting  | Yes | <input type="checkbox"/> |
| 11 n   | Training and Education   | Yes | <input type="checkbox"/> |
| 11 o   | Transaction Monitoring   | Yes | <input type="checkbox"/> |
| 12   | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?   | Yes | <input type="checkbox"/> |
| 13   | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?   | No  | <input type="checkbox"/> |
| 13 a   | If Y, provide further details  | N/A |                          |
| 14   | Does the entity have a whistleblower policy?   | Yes | <input type="checkbox"/> |
| <b>3. ANTI BRIBERY &amp; CORRUPTION</b>                      |  |     |                          |
| 15   | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes | <input type="checkbox"/> |
| 16   | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  | Yes | <input type="checkbox"/> |
| 17   | Does the Entity provide mandatory ABC training to:   |     |                          |
| 17 a   | Board and Senior Committee Management  | Yes | <input type="checkbox"/> |
| 17 b   | 1st Line of Defence  | Yes | <input type="checkbox"/> |
| 17 c   | 2nd Line of Defence  | Yes | <input type="checkbox"/> |
| 17 d   | 3rd Line of Defence  | Yes | <input type="checkbox"/> |
| 17 e   | Third parties to which specific compliance activities subject to ABC risk have been outsourced   | Yes | <input type="checkbox"/> |
| 17 f   | Non-employed workers as appropriate (contractors/consultants)  | Yes | <input type="checkbox"/> |
| <b>4. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b> |  |     |                          |
| 18   | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:       |     |                          |
| 18 a   | Money laundering   | Yes | <input type="checkbox"/> |
| 18 b   | Terrorist financing  | Yes | <input type="checkbox"/> |
| 18 c   | Sanctions violations   | Yes | <input type="checkbox"/> |
| 19   | Does the Entity have policies and procedures that:   |     |                          |
| 19 a   | Prohibit the opening and keeping of anonymous and fictitious named accounts  | Yes | <input type="checkbox"/> |
| 19 b   | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs   | Yes | <input type="checkbox"/> |
| 19 c   | Prohibit dealing with other entities that provide banking services to unlicensed banks   | Yes | <input type="checkbox"/> |
| 19 d   | Prohibit accounts/relationships with shell banks   | Yes | <input type="checkbox"/> |
| 19 e   | Prohibit dealing with another Entity that provides services to shell banks   | Yes | <input type="checkbox"/> |
| 19 f   | Prohibit opening and keeping of accounts for Section 311 designated entities   | Yes | <input type="checkbox"/> |
| 19 g   | Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents     | Yes | <input type="checkbox"/> |
| 19 h   | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  | Yes | <input type="checkbox"/> |
| 19 i   | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees  | Yes | <input type="checkbox"/> |
| 19 j   | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News  | Yes | <input type="checkbox"/> |

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

|                                      |  |  |                                  |
|--------------------------------------|--|--|----------------------------------|
| 30 l                                 | Nuclear power  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 m                                 | Payment Service Providers  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 n                                 | PEPs   | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 o                                 | PEP Close Associates   | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 p                                 | PEP Related  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 q                                 | Precious metals and stones   | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 r                                 | Red light businesses/Adult entertainment   | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 s                                 | Regulated charities  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 t                                 | Shell banks  | Prohibited   | <input type="button" value="v"/> |
| 30 u                                 | Travel and Tour Companies  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 v                                 | Unregulated charities  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 w                                 | Used Car Dealers   | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 x                                 | Virtual Asset Service Providers  | EDD on risk-based approach   | <input type="button" value="v"/> |
| 30 y                                 | Other (specify)  | N/A  |                                  |
| 31                                   | If restricted, provide details of the restriction  | As required by applicable laws and the company policy                          |                                  |
| <b>6. MONITORING &amp; REPORTING</b> |  |  |                                  |
| 32                                   | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?   | Yes  | <input type="button" value="v"/> |
| 33                                   | What is the method used by the Entity to monitor transactions for suspicious activities?   | Manual   | <input type="button" value="v"/> |
| 33 a                                 | If manual or combination selected, specify what type of transactions are monitored manually  | N/A  |                                  |
| 34                                   | Does the Entity have regulatory requirements to report suspicious transactions?  | Yes  | <input type="button" value="v"/> |
| 34 a                                 | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?   | Yes  | <input type="button" value="v"/> |
| 35                                   | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?  | Yes  | <input type="button" value="v"/> |
| <b>7. PAYMENT TRANSPARENCY</b>       |  |  |                                  |
| 36                                   | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?  | Yes  | <input type="button" value="v"/> |
| 37                                   | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:   |  |                                  |
| 37 a                                 | FATF Recommendation 16   | Yes  | <input type="button" value="v"/> |
| 37 b                                 | Local Regulations  | Yes  | <input type="button" value="v"/> |
| 37 b1                                | If Y, Specify the regulation   | The Firm has policies and procedures to comply with all applicable regulations |                                  |
| 37 c                                 | If N, explain  | N/A  |                                  |
| <b>8. SANCTIONS</b>                  |  |  |                                  |
| 38                                   | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?  | Yes  | <input type="button" value="v"/> |
| 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  | <input type="button" value="v"/> |

|   |   |  |                                  |
|---|---|--|----------------------------------|
| 40  | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?   | Yes  | <input type="button" value="v"/> |
| 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 tra | <input type="button" value="v"/> |
| 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 tra | <input type="button" value="v"/> |
| 41 c  | Office of Financial Sanctions Implementation HMT (OFSI)   | Used for screening customers and beneficial owners and for filtering tra | <input type="button" value="v"/> |
| 41 d  | European Union Consolidated List (EU)   | Used for screening customers and beneficial owners and for filtering tra | <input type="button" value="v"/> |
| 41 e  | Lists maintained by other G7 member countries   | Used for screening customers and beneficial owners and for filtering tra | <input type="button" value="v"/> |
| 41 f  | Other (specify)   | The firm also screens against multiple applicable list                   |                                  |
| 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   | <input type="button" value="v"/> |
| <b>9. TRAINING &amp; EDUCATION</b>  |   |  |                                  |
| 43  | Does the Entity provide mandatory training, which includes:   |  |                                  |
| 43 a  | Identification and reporting of transactions to government authorities  | Yes  | <input type="button" value="v"/> |
| 43 b  | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered   | Yes  | <input type="button" value="v"/> |
| 43 c  | Internal policies for controlling money laundering, terrorist financing and sanctions violations  | Yes  | <input type="button" value="v"/> |
| 43 d  | New issues that occur in the market, e.g. significant regulatory actions or new regulations   | Yes  | <input type="button" value="v"/> |
| 44  | Is the above mandatory training provided to :   |  |                                  |
| 44 a  | Board and Senior Committee Management   | Yes  | <input type="button" value="v"/> |
| 44 b  | 1st Line of Defence   | Yes  | <input type="button" value="v"/> |
| 44 c  | 2nd Line of Defence   | Yes  | <input type="button" value="v"/> |
| 44 d  | 3rd Line of Defence   | Yes  | <input type="button" value="v"/> |
| 44 e  | Third parties to which specific FCC activities have been outsourced   | No   | <input type="button" value="v"/> |
| 44 f  | Non-employed workers (contractors/consultants)  | Yes  | <input type="button" value="v"/> |
| <b>10. AUDIT</b>  |   |  |                                  |
| 45  | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Yes  | <input type="button" value="v"/> |
| <p><b>Signature Page</b></p> <p>Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)<br/>ALCENTRA LIMITED</p> <p>_____ (Financial Institution name)</p> <p>JAMES ALGAR</p> <p>I, _____ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.</p> <p>DocuSigned by:  2/12/2024   7:36 AM PST<br/>FA35672F25304AC... (Signature &amp; Date)</p> |   |  |                                  |