




**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 













6 d	Privately Owned	No
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	549300LRIF3NWCU26A80
2. AML, CTF & 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
11 e	CDD	Yes
11 f	EDD	Yes

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?	Yes	<input type="checkbox"/>
13 a	If Y, provide further details	On a case by case basis. Certain lines of business may contract with third parties (such as for its fund business, transfer agents may administer BlackRock funds including conducting customer due diligence) to carry out specified AML functions.	
14	Does the entity have a whistleblower policy?	Yes	<input type="checkbox"/>
3. 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?	Yes	
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	
17	Does the Entity provide mandatory ABC training to:		
17 a	Board and Senior Committee Management	Yes	
17 b	1st Line of Defence	Yes	
17 c	2nd 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	No	
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes	
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	Yes	
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
19 d	Prohibit accounts/relationships with shell banks	Yes	
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	
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	
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	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	
21 a	If Y, what is the retention period?	5 years or more	
5. KYC, CDD and EDD			
22	Does the Entity verify the identity of the customer?	Yes	
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	
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 c	Nature of business/employment	Yes	
24 d	Ownership structure	Yes	
24 e	Product usage	Yes	
24 f	Purpose and nature of relationship	Yes	
24 g	Source of funds	Yes	
24 h	Source of wealth	Yes	
25	Are each of the following identified:		

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	
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 Wolfsberg Correspondent Banking Principles 2022?	Please select
30 c	Embassies/Consulates	EDD on risk-based approach
30 d	Extractive industries	EDD on risk-based approach
30 e	Gambling customers	EDD on risk-based approach
30 f	General Trading Companies	EDD on risk-based approach
30 g	Marijuana-related Entities	EDD on risk-based approach
30 h	MSB/MVTS customers	EDD on risk-based approach
30 i	Non-account customers	Prohibited

30 j	Non-Government Organisations	EDD on risk-based approach 
30 k	Non-resident customers	EDD on risk-based approach 
30 l	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 
30 p	PEP Related	EDD on risk-based approach 
30 q	Precious metals and stones	EDD on risk-based approach 
30 r	Red light businesses/Adult entertainment	EDD on risk-based approach 
30 s	Regulated charities	EDD on risk-based approach 
30 t	Shell banks	Prohibited 
30 u	Travel and Tour Companies	EDD on risk-based approach 
30 v	Unregulated charities	EDD on risk-based approach 
30 w	Used Car Dealers	EDD on risk-based approach 
30 x	Virtual Asset Service Providers	EDD on risk-based approach 


30 y	Other (specify)	
31	If restricted, provide details of the restriction	The above-listed categories of customers or industries may be subject to additional due diligence and/or customer selection and approval process. EDD and restrictions may vary by jurisdiction in accordance with local laws and can be assessed on a case-by-case basis.
6. MONITORING & 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 
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Suspicious activities reported by employees, business divisions and transfer agents are registered in the internal Transaction Surveillance and Suspicious activity screening tool but are monitored manually.
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes 
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes 
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes 
7. PAYMENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Please select
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 c	If N, explain	BlackRock Inc. is a global asset manager and as such it does not perform payment activities. All payments are performed by a custodian bank pursuant to their payment standards and requirements.
8. SANCTIONS		
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 transactional data.
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 transactional data.
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data.

41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data.	<input type="checkbox"/>
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data.	<input type="checkbox"/>
41 f	Other (specify)	In relation to question 41e, BlackRock takes reasonable steps to ensure that it does not accept or maintain relationships with any sanctioned person or entity named on lists published by some of the G7 member countries as well as other bodies relevant to the jurisdictions in which BlackRock operates.	
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="checkbox"/>
9. TRAINING & EDUCATION			
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	<input type="checkbox"/>
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="checkbox"/>
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	<input type="checkbox"/>
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	<input type="checkbox"/>
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	<input type="checkbox"/>
44 b	1st Line of Defence	Yes	<input type="checkbox"/>

44 c	2nd Line of Defence	Yes	
44 d	3rd Line of Defence	Yes	
44 e	Third parties to which specific FCC activities have been outsourced	Yes	
44 f	Non-employed workers (contractors/consultants)	Yes	

10. AUDIT

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	
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Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)
BlackRock, Inc. (Financial Institution name).
 I, John MacKessy (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.

June 10, 2023 (Signature & Date)

John MacKessy