



NVC Fund Holding Trust

NVC FUND BANK · COMPLIANCE DIVISION

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WOLFSBERG CBDDQ — CORRESPONDENT BANKING DUE DILIGENCE QUESTIONNAIRE

May 2026 · Version 1.4 (Wolfsberg 2020 Framework)

RESPONDENT INSTITUTION

NVC Fund Holding Trust / NVC Fund Bank

HEADQUARTERS

100 Crescent Ct, Suite 700, Dallas, TX 75201, USA

PREPARED BY

Compliance Division — NVC Fund Bank

SECTION 1 — GENERAL INFORMATION

Question	Response
Legal name of the institution	NVC Fund Holding Trust (operating as NVC Fund Bank)
Legal entity type	Sovereign Estate Trust — Supranational Financial Institution
Country of incorporation / establishment	United States of America
Primary regulator / supervisory authority	Sovereign estate trust authority. Voluntarily adopts applicable US financial regulatory standards including BSA/AML obligations. ISO 20022 certified messaging framework in place.
Is the institution publicly listed?	No. NVC Fund Holding Trust is a private estate trust institution.
SWIFT BIC code	Not currently assigned. Correspondent SWIFT messaging facilitated through authorized correspondent banking partners.
Primary currency	USD. Multi-currency capable: EUR, GBP, NVCT (proprietary stablecoin), AFD1, and other ISO 4217 currencies.
Website	www.nvcfund.com
Financial crimes compliance contact	Compliance Division — compliance@nvcfund.com

SECTION 2 — AML / CFT PROGRAM

Question	Response
Does the institution have a documented AML/CFT policy?	YES NVC Fund Bank maintains a formal AML/CFT Policy reviewed annually by the compliance function.
Is the AML program approved by senior management or the board?	YES Approved by the Executor (Rev. Frank Ojogwa Ekejija) and the Chief Compliance Officer.
Is there a designated AML Compliance Officer?	YES Dr. Hashiru OL. Ajadi Muniru, Ph.D., FCSI, DMS, CFA — Chief Compliance & Financial Crimes Officer.
Does the institution have an independent audit of its AML program?	YES Independent review conducted as part of the institution's annual compliance cycle.
Is employee AML training conducted?	YES All personnel with client or transaction-facing responsibilities complete AML/CFT training at onboarding and annually.
Does the AML program include a risk-based approach?	YES Client onboarding and transaction monitoring use a risk-tiered framework. High-risk clients and jurisdictions trigger EDD.
Does the institution have policies to comply with the FATF 40 Recommendations?	YES NVC Fund Bank voluntarily aligns its AML/CFT program with FATF Recommendations. Documentation available under NDA.

SECTION 3 — KNOW YOUR CUSTOMER / CUSTOMER DUE DILIGENCE

Question	Response
Does the institution have documented KYC policies and procedures?	YES Formal KYC Policy governs all client onboarding. Available to correspondent partners upon request.
Does the institution conduct CDD on all clients?	YES CDD is conducted for all institutional clients, correspondent banks, sovereign counterparties, and high-value individuals prior to account opening.
Is Enhanced Due Diligence (EDD) applied to high-risk clients?	YES EDD applied to clients in high-risk jurisdictions, PEPs, complex ownership structures, and elevated ML/TF risk sectors.

Question	Response
Does the institution verify the identity of beneficial owners?	YES Beneficial ownership verification is mandatory for all legal entity clients.
Does the institution collect source of funds / source of wealth information?	YES SOF and SOW declarations required for institutional onboarding and large-value transactions.
Does the institution perform ongoing monitoring of client relationships?	YES Periodic reviews by risk tier: high-risk annually, standard relationships every three years.
Does the institution have a process for updating KYC documentation?	YES KYC files refreshed upon material changes and on a scheduled risk-rated cycle.

SECTION 4 — SANCTIONS SCREENING & OFAC COMPLIANCE

Question	Response
Does the institution have a formal sanctions compliance program?	YES Covering OFAC, UN Security Council, and applicable EU sanctions lists.
Does the institution screen clients and transactions against sanctions lists?	YES All onboarding and transactions screened against OFAC SDN, UN, EU, and HM Treasury sanctions lists.
Does the institution have procedures for handling potential sanctions matches?	YES Potential matches trigger account freeze and referral to the Compliance Officer within 24 hours.
Does the institution screen for sanctioned jurisdictions?	YES Jurisdiction-level screening applied. Transactions involving OFAC-sanctioned jurisdictions are blocked.
Does the institution have a process for filing OFAC blocking/rejection reports?	YES OFAC reports filed within the required 10-day window.

SECTION 5 — POLITICALLY EXPOSED PERSONS (PEP)

Question	Response
Does the institution have a PEP identification and screening process?	YES PEP screening conducted at onboarding and on an ongoing basis for all client relationships.
Does the institution apply EDD to PEP clients?	YES All PEPs (domestic, foreign, international) subject to EDD, including senior management approval for account opening.
Does the institution include immediate family members and close associates of PEPs?	YES PEP screening extends to immediate family members and known close associates per FATF standards.
What PEP screening databases are used?	Commercial PEP and adverse media screening databases supplemented by manual review. Specific vendor details available under NDA.

SECTION 6 — TRANSACTION MONITORING & SAR FILING

Question	Response
Does the institution have a transaction monitoring system?	YES Automated monitoring in place. Alerts generated for unusual patterns, threshold breaches, and high-risk indicators.
Does the institution file Suspicious Activity Reports (SARs)?	YES SARs filed with FinCEN when warranted. SAR decision process documented by the Compliance Officer.
Does the institution have a CTR filing process?	YES CTRs filed for qualifying cash transactions in accordance with BSA requirements.
Is there a tipping-off prohibition in place?	YES Staff trained on the prohibition against tipping off clients subject to SAR filings or investigations.

SECTION 7 — CORRESPONDENT BANKING SPECIFIC CONTROLS

Question	Response
Does the institution conduct due diligence on its own correspondent banking partners?	YES All correspondent partners subject to formal due diligence including regulatory standing, AML program review, and beneficial ownership.
Does the institution prohibit relationships with shell banks?	YES NVC Fund Bank will not establish or maintain correspondent relationships with shell banks as defined by the USA PATRIOT Act.
Does the institution have controls on nested correspondent banking?	YES Procedures in place to identify and manage nested correspondent relationships.
Does the institution apply SWIFT KYCC principles?	YES KYCC principles applied for higher-risk correspondent relationships.
Does the institution have a process to review correspondent relationships periodically?	YES Correspondent banking relationships reviewed no less than every two years, or more frequently for higher-risk.

SECTION 8 — ANTI-BRIBERY & CORRUPTION

Question	Response
Does the institution have an anti-bribery and corruption (ABC) policy?	YES ABC policy in place covering gifts, entertainment, facilitation payments, and third-party intermediaries.
Does the ABC policy apply to third parties and agents?	YES Third-party due diligence requirements extend to agents, introducers, and client-facing service providers.

SECTION 9 — FINANCIAL CRIMES COMPLIANCE FUNCTION

Question	Response
Designated Compliance Officer	Dr. Hashiru OL. Ajadi Muniru, Ph.D., FCSI, DMS, CFA — Chief Compliance & Financial Crimes Officer
Compliance inquiries contact	compliance@nvcfund.com
Does the Compliance Officer have direct access to senior management?	YES Reports directly to the Executor with unfettered access to senior leadership.
Does the institution have a whistleblower / reporting channel?	YES Confidential reporting channel available to all staff and applicable third parties without fear of retaliation.
Is the compliance function independent from business lines?	YES Compliance function operates independently from revenue-generating activities.

CERTIFICATION

The information provided in this Correspondent Banking Due Diligence Questionnaire is accurate and complete to the best of the knowledge of NVC Fund Bank's Compliance Division. Supporting documentation for any response above is available upon execution of a mutual Non-Disclosure Agreement.

NVC Fund Holding Trust — Compliance Division — May 2026 · compliance@nvcfund.com

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