Financial Institution Name:	**VerbundVolksbank OWL eG**
Location (Country) :	**Paderborn, Germany**

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
1. ENTITY & OWNERSHIP		
1	Full Legal Name	**VerbundVolksbank OWL eG**
2	Append a list of branches which are covered by this questionnaire	all branches as shown on our website: https://www.verbundvolksbank-owl.de/service/filialfinder.html
3	Full Legal (Registered) Address	Neuer Platz 1 , 33098 Paderborn, Germany
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	06.07.1897
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/ Mutual	Yes
6 c	Government or State Owned by 25% or more	no
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	We are a cooperative with more than 160,000 members. None of them holds more than 1 % of our shares.
7	% of the Entity's total shares composed of bearer shares	none
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	Name of primary financial regulator / supervisory authority	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), Bonn
11	Provide Legal Entity Identifier (LEI) if available	529900NYZV9N6UZ09F32
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

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13	Jurisdiction of licensing authority and regulator of ultimate parent	Germany
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking / Wealth Management	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	no
14 f	Financial Markets Trading	no
14 g	Securities Services / Custody	no
14 h	Broker / Dealer	no
14 i	Multilateral Development Bank	no
14 j	Wealth Management	no
14 k	Other	-
15	Does the Entity have a significant (10% or more) non-resident customer base, either by number of customers or by revenues (where non-resident means not domiciled in the jurisdiction where bank services are being provided)?	no
15 a	If Y, provide details of the country and %	
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than $500 million
17	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information / context to the answers in this section.	Our GIIN is RDDXW9.99999.SL.276
2. PRODUCTS & SERVICES		
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?	no
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?	no
19 a1e	Does the Entity allow downstream relationships with foreign Banks?	no
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 Service Businesses (MSBs) / Money Value transfer services (MVTSs)?	no
19 a1h	Does the Entity allow correspondent banking services to regulated Money Service Businesses (MSBs) / Money Value transfer services (MVTSs) or Payment Service Providers (PSPs)?	
19 a1h1	MSBs	no
19 a1h2	MVTSs	no
19 a1h3	PSPs	no

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS/PSPs?	no
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	No
19 g	Low Price Securities	no
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?	no
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Services Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other	
19 j	Private Banking (domestic & international)	Yes
19 k	Remote Deposit Capture (RDC)	no
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	Yes
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 dilligence	
19 p1	Check cashing service	No
19 p1a	If yes, sthate the applicable level of due dilligence	
19 p2	Wire transfers	No
19 p2a	If yes, sthate the applicable level of due dilligence	
19 p3	Foreign currency conversions	No
19 p3a	If yes, sthate the applicable level of due dilligence	
19 p4	Sale of monetary Instruments	No
19 p4a	If yes, sthate the applicable level of due dilligence	
19 p5	If you offer services to walk-in customers please provide more detail here, including describing the level of due diligence	No
19 q	Other high-risk products and services identified by the entity (please specify)	No
20	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
21	If appropriate, provide any additional information / context to the answers in this section.	
3. AML, CTF & SANCTIONS PROGRAMME		
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	Not Applicable
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

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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?	Less than 10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	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?	Yes
26 a	If Y, provide further details	In addition to our sanctions and adverse information screening we use DZ BANK AG for transaction screening.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme 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.	
29	If appropriate, provide any additional information / context to the answers in this section.	22 d: there are no reporting obligations in Germany
4. ANTI BRIBERY & CORRUPTION		
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?	No
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:	all employees
34 a	Joint ventures	No
34 b	Third parties acting on behalf of the Entity	Yes
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?	No
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?	No
37	Does the Board receive, assess, and challenge regular Management Information on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completetd in the last 12 months?	No
38 a	If N, provide the date when the last ABC EWRA was completed	12 Months
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

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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	No
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	No
42 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section Anti Bribery & Corruption 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.	
45	If appropriate, provide any additional information / context to the answers in this section.	
5. POLICIES & PROCEDURES		
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?	Yes
48	Are the Entity's policies and procedures gapped against/compared to:	
48 a	US Standards	no
48 a1	If Y, does the Entity retain a record of the results?	
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	Yes
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	no
49 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes

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49 i	Define escalation processes for financial crime risk issues/potentially suspicious activity identified by employees	all employees are instructed to directly inform AML Officer
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Terminations decided by AML Officer with duration of max. 2 months
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	After cancelling all accounts customer data are blocked
49 l	Define the process an controls to identify and handle customers that were previously exited for financial crime reasons if the seek to re-establish a relationship	As older customer data are blocked duplication of customer data is controlled daily
49 m	Outline the processes regarding screening for sanctions, PEPs and negative media	Daily screening based on supported data
49 n	Outline the processes for the maintenance of internal "watchlists"	Daily screening based on suspicious activity identified by employees or adverse media
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 a 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 POLICIES & PROCEDURES 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.	
52 b	If appropriate, provide any additional information / context to the answers in this section.	
6. AML, CTF & SANCTIONS RISK ASSESSMENT		
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?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
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	Transaction Screening	Yes
58 c	Name Screening	Yes
58 d	List Management	Yes

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58 e	Training and Education	Yes
58 f	Governance	Yes
58 g	Management Information	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT 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.	
60 b	If appropriate, provide any additional information / context to the answers in this section.	
7. KYC, CDD and EDD		
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	Ownership structure	Yes
64 b	Customer identification	Yes
64 c	Expected activity	Yes
64 d	Nature of business/employment	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	No
65 d	Other relevant parties	fictious beneficial owners
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)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	No
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	Credit application
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

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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?	
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?	Combination of automated and manual
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	No
74 a2	1-2 years	High risk customers
74 a3	3-4 years	No
74 a4	5 years or more	medium an low risk customers
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other	
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?	Yes
76 a	Arms, defense, military	EDD & Restricted on a risk based approach
76 b	Respondent Banks	EDD & Restricted on a 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	No
76 d	Extractive Industries	No
76 e	Gambling customers	EDD & Restricted on a risk based approach
76 f	General trading Companies	No
76 g	Marijuana-related Entities	EDD & Restricted on a risk based approach
76 h	MSB/MVTS customers	EDD & Restricted on a risk based approach
76 i	Non-account customers	EDD & Restricted on a risk based approach
76 j	Non-Government Organisations	EDD & Restricted on a risk based approach
76 k	Non-resident customers	EDD & Restricted on a risk based approach
76 l	Nuclear Power	EDD & Restricted on a risk based approach
76 m	Payment Service Providers	EDD & Restricted on a risk based approach
76 n	PEPs	EDD & Restricted on a risk based approach
76 o	PEP Close Associates	EDD & Restricted on a risk based approach
76 p	PEP related	EDD & Restricted on a risk based approach
76 q	Precious metals and stones	No
76 r	Red light businesses/Adult entertainment	No
76 s	Regulated charities	No
76 t	Shell Banks	Prohibited
76 u	Travel and Tour Companies	EDD & Restricted on a risk based approach
76 v	Unregulated charities	EDD & Restricted on a risk based approach
76 w	Used Car dealers	EDD & Restricted on a risk based approach
76 x	Virtual Asset Service Providers	EDD & Restricted on a risk based approach
76 y	Other (specify)	No
77	If restricted, provide details of the restriction	Restricted by management and documented in onboarding processes, governance in compliance division
78	Does EDD require senior business management and/or compliance approval?	Yes

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78 a	If Y indicate who provides the approval:	AML Officer
79	Does the Entity have specific procedures for onboarding entities that handle client oney such als lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an andditionaltional 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	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
82	If appropriate, provide any additional information / context to the answers in this section.	Unlicensed or illegal business is generally prohibited.
8. MONITORING & REPORTING		
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?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tool
84 b1	If "Vendor-sourced tool" or "Both" selected, what is the name of the vendor/tool?	Geno-SONAR by Atruvia AG
84 b2	When was the tool last updated?	May 2026
84 b3	When was the automated Transaction Monitoring application last calibrated?	July 2026
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 transactions 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.	
9. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

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93	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	Specify the regulation	German anti money laundering act ("Geldwäschegesetz"), german act on compliance with special organizational obligations in cashless payment transactions (§ 25g Kreditwesengesetz) referring to EU regulation 2023/1113 and 2024/884 on information accompanying transfers of funds (i. ex. "EU-Geldtransferverordnung", former regulation EU 2015/847 and 1781/2006)
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in international 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 PAYMENT TRANSPARENCY 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.	
10. SANCTIONS		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect 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 of vendor-sourced tools used?	Vendor-sourced tool
102 a1a	If "automated" or "both automated and manual" selected, what is the name of the vendor/tool?	SMARAGD and Geno-SONAR
102 a2	When did you last test the effecitveness (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)	Nov 25
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

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105	Does the Entity havea 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 (i.e. reference data)
106 f	Other (specify)	German Sanctions Lists from Bundesbank and BaFin
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 days
107 b	Transactions	immediately to next day
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 and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section SANCTIONS 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.	
11. TRAINING & EDUCATION		
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)	No
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?	Yearly and on trigger event
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

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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.	
12. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate to the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate to 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.	
13. AUDIT		
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	Yearly
122 b	External Third Party	Yearly
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, AUDIT 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.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

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129	Does the Entity have a real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support ist fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information / context to the answers in this section.	

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)

VerbundVolksbank OWL eG 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.

VerbundVolksbank OWL eG 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.

VerbundVolksbank OWL eG recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

VerbundVolksbank OWL eG further certifies it complies 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 on a two-year basis.

VerbundVolksbank OWL eG commits to file accurate supplemental information on a timely basis.

I, Christopher Heinemann (Head of International dept.), 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 VerbundVolksbank OWL eG.

I, Ingemar Hansmann (Group Money Laundering Prevention Officer), certify that I have read and understood this declaration, that the answers provided in thisWolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of VerbundVolksbank OWL eG.

27.08.2026 _____ (Signature & Date (DD/MM/YYYY))

28.08.2026 _____ (Signature & Date (DD/MM/YYYY))

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