the Wolfsberg Group

Financial Institution Name:

Location (Country) :

VerbundVolksbank OWL eG

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 #	en lesse en	Answer
	Full Legal Name	VerbundVolksbank OWL eG
1	Full Legal Name	Verbungvotksbank Ovil eg
2	Append a list of branches which are covered by this questionnaire	all branches as shown on our website: https://www.verbundvolksbank- owLde/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	
6a	Publicly Traded (25% of shares publicly traded)	No
6a1	If Y, indicate the exchange traded on and ticker symbol	
66	Member Owned/ Mutual	Yes
6 c	Government or State Owned by 25% or more	πο
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)	

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	no
	base, either by number of customers or by revenues (where non-resident	
	means not domiciled in the jurisdiction where bank services are being	
	provided)?	
15 a	If Y, provide details of the country and %	
16	Select the closest value:	······································
ло 16а	Number of employees	1001-5000
16b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section ENTITY &	Yes
17	OWNERSHIP are representative of all the LE's branches	165
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 G N is RDDXW9.99999.SL.276
	in this section.	
2. PRODI	in this section. JCTS & SERVICES	
2. PROD	in this section. JCTS & SERVICES Does the Entity offer the following products and services:	
2: PRODI 19 19 a	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	Yes
2. PRODI 19 19 a 19 a	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
2: PRODI 19 19 a	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	
2. PRODI 19 19 a 19 a	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
2. PRODI 19 19 a 19 a1 19 a1 19 a1a	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify	Yes Yes
2. PRODI 19 19 a 19 a1 19 a1 19 a1 19 a1 19 a1 19 a1c	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Yes No
2. PRODI 19 19 a 19 a1 19 a1 19 a1a 19 a1b	In this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes Yes По Yes
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1e	In this section.	Yes Yes no Yes no
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1e	in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer correspondent banking services to foreign Banks?	Yes Yes no Yes no no
2. PRODU 19 19 a 19 a1 19 a1 19 a1a 19 a1c 19 a1c 19 a1c 19 a1c 19 a1f	In this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity allow downstream relationships with foreign Banks?	Yes Yes no Yes no no
2: PRODU 19 19 a 19 a1 19 a1 19 a1a 19 a1b 19 a1c 19 a1c 19 a1d 19 a1g	In this section.	Yes Yes no Yes no No Yes no
2: PRODU 19 19 a 19 a1 19 a1 19 a1a 19 a1c 19 a1c 19 a1c 19 a1c 19 a1g 19 a1g	In this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer correspondent banking services to foreign Banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign Banks? Does the Entity offer correspondent banking services to regulated Money Service Businesses (MSBs) / Money Value transfer services (MVTSs) or Payment Service Fourders (PSPs)?	Yes Yes no Yes no No Yes no
2. PRODU 19 19 al 19 al	In this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity offer correspondent banking services to regulated Money Service Businesses (MSBs) / Money Value transfer services (MVTSs) or Payment Service Providers (PSPs)?	Yes Yes по Yes no No No No No
2: PRODU 19 19 a 19 a 19 a 19 a 19 a 19 a 19 a 1	In this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer correspondent banking services to foreign Banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity allow downstream relationships with foreign Banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign Banks? Does the Entity offer correspondent banking services to regulated Money Service Businesses (MSBs) / Money Value transfer services (MVTSs) or Payment Service Fourders (PSPs)?	Yes Yes no Yes no No Yes no

19 a 1 î		
	Does the Entity have processes and procedures in place to identify	on
	downstream relationships with MSB /MVTS/PSPs?	
196	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	no
	payment services to their customers?	
19 i 1	If Y, please select all that apply below?	
19 (2	Third Party Payment Services Providers	
19 i 3	Virtual Asset Service Providers (VASPs)	
19 i 4	eCommerce Platforms	
19 5	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
190	Virtual Assets	No
19p	For each of the following please state whether you offer the service to	·····
1.0 0	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	ΠΟ
19 p4a	If yes, sthate the applicable level of due dilligence	
19 p 44	If you offer services to walk-in customers please provide more detail here,	No
	including describing the level of due diligence	
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, CT	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and	
	Sanctions standards regarding the following components:	
	Appointed Officer with sufficient experience/expertise	Yes
22 a		
22 a 22 b	Adverse Information Screening	Yes
22 b	Adverse Information Screening Beneficial Ownership	Yes Yes
	Beneficial Ownership	
22 b 22 c 22 d	Beneficial Ownership Cash Reporting	Yes
22 b 22 c 22 d 22 e	Beneficial Ownership Cash Reporting CDD	Yes Not Applicable Yes
22 b 22 c 22 d 22 e 22 f	Beneficial Ownership Cash Reporting CDD EDD	Yes Not Applicable Yes Yes
22 b 22 c 22 d 22 e 22 f 22 g	Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Not Applicable Yes Yes Yes
22 b 22 c 22 d 22 e 22 f 22 g 22 h	Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Not Applicable Yes Yes Yes Yes
22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 h 22 h	Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Not Applicable Yes Yes Yes Yes Yes
22 b 22 c 22 d 22 e 22 f	Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Not Applicable Yes Yes Yes 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 RO	IBERY & 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 34 a	Is the Entity's ABC programme applicable to: Joint ventures	all employees No
346	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, Prohibits the 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	18 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
		L

90 b Corruption risks associated with the countries and mixtures is which the Entity does business, including these that involve state- owned or state-controlled entities or public officials Yes 90 cl Corruption risks associated withing first and hospitality, hing/internalipp, charbabe constrones activities that may materially increase the Entity's corruption risk associated withing first and hospitality, hing/internalipp, corruption risks associated withing first and hospitality, hing/internalipp, corruption risks associated withing first and hospitality, hing/internalipp, corruption risks Yes 40 cl Charges in burness activities that may materially increase the Entity's corruption risk. Yes 42 Deas the Entity provide mandatory ABC training to: corruption risk associated with agent and hospitality. Yes 43 Deas the Entity provide mandatory ABC training to: corruption risk associated within agent and hospitality. Yes 44 Deas the Entity provide mandatory ABC training to: corruption risk associated within agent and hospitality. Yes 45 Deas the Entity provide mandatory ABC training to: corruption risk associated within agent and the state of the ABC risk. No 46 Deas the Entity provide mandatory ABC training to: corruption risk associated within agent and the state of the ABC risk. No 47 Deas the Entity worker as appropriate constatement to associate and writer as appropriate constatement to associate and writer as appropriate constatement to associate and writer asuppropriate constatement to thassocian. No	
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ehartable donations and political contributions expeription fisk 40 e Changes in business activities that may materially increase the Entity's Yes 41 Does the Entity's internal audit function or other independent third party Yes 42 Board and serior Committee Management Yes 42 Baard and serior Committee Management Yes 42 Jat Line of Defence No 42 Still ne of Defence No 43 Still and Ordefence No 44 Still and Ordefence No 45 Still and Ordefence No 46 Still and Ordefence No 47 Board All Committee Admagement No 48 Does the Entity provide any activities subject to ABC risk No 49 Still and Ordefence No 41 No.remployad vockers as appropriate (contractory.consuttantal) No 42 Does the Entity provide ABC training that is targeted to specific roles, No No 43 Compiliance activities? Yes 44 Compositions that difference/stracts to add the branch/es If appropriate, provide any additional information / context to the answere 45 Mongy Landfering Yes 46 Mongy Landfering Yes	
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cover ABC Policies and Procedures? 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 d 3rd Line of Defence No 43 d Are menJoyed workers as appropriate (contractors/consuttants] No 44 d Confirm that all response provided in the above Section Artil Bribery & Corruption are representative of all the LE's branches No 44 d Confirm that all response provided in the above Section Artil Bribery & Corruption are representative of all the LE's branches No 45 in this applies to no. If appropriate provide any additional information / context to the enswere in this section. No 46 d Mony landering Yes 47 a the Entity provide any additional information / context to the enswere in this eaction. Yes 47 Are the Entity provide and procedures consistent with applicable AML, CIT & Sanctions regulations and requirements to reasonably provent, detect and report: Yes 48 a US Standards no 49 b Terrorist financing Yes 44 b US standards no 49 b US standards no 40 b Editional and rec	
42 a Board and service Committee Management Yes 42 b 1st Line of Defence No 42 c 2nd Line of Defence No 42 d Srd Line of Defence No 42 d Srd parties to which specific compliance activities subject to ABC risk. No 42 e And parties to which specific compliance activities subject to ABC risk. No 43 Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? No 44 Commit that all responses provide ABC training that is targeted to specific roles, responsibilities and activities? Yes 44 a I'N, clarify which questions the difference/s testa to and the branch/es that this applies to any additional information / context to the answers in the specific roles, response provide any additional information / context to the answers in the specific roles and procedures consistent with applicable ANL, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 45 B Fact Entity role detect and report: 46 A Money laundering 47 Are the Entity solicies and procedures gapped against/compared to: 48 A US Standards. 49 Does the Entity role and procedures gapped against/compared to: 48 Are the Entity solicies and procedures gapped against/compared to: 46 Are the Entity retain a record of the results? 47 Are the Entity rotain arecord of the results? 48	
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42 e 3rd parties to which specific compliance activities subject to ABC risk have been outsourced No 43 f No-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 Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches Yes 45 ff Appropriate, provide any additional information / context to the answers in this section. No 5 POLICIES & PROCEDURES Yes 46 Money laundering Yes 47 An the Entity occurrent ad policies and procedures consistent with applicable ANL, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Yes 46 Money laundering Yes 47 An the Entity policies and procedures updated at least annually? Yes 48 a US Standards no 49 b If Y, does the Entity retain a record of the results? Yes 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NPFis Yes 49 c Prohibit the opening and keeping of accounts for unlicensed banks and/or NPFis Yes 49 c Prohibit dealing with other entity that provides services to shell banks <t< td=""><td></td></t<>	
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44 a. If N, clarify which guestions 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 POLICES 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 a Money laundering Yes 46 a Money laundering Yes 47 Are the Entity's policies and procedures updated at least annually? Yes 48 Are the Entity's policies and procedures updated at least annually? Yes 48 US Standards no 49 a US Standards Yes 49 b EU Standards Yes 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts Yes 49 a Prohibit the opening and keeping of accounts for unlicensed banks and/or unlicensed banks Yes 49 c Prohibit dealing with other entity that provide services to unlicensed banks Yes 49 c Prohibit dealing with other entity that provide services to shell banks Yes	
45 If appropriate, provide any additional information / context to the answers in this section. 5. POLICES 8 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 47 Are the Entity's policies and procedures updated at least annually? Yes 48.a US Standards no 48.a US standards no 48.a US standards Yes 49.b EU standards Yes 49.a US standards Yes 49.a Posibit the opening and keeping of anonymous and flectitious 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 services to unlicensed banks Yes 49.d Prohibit dealing with another entity that provides services to shell banks Yes 49.d Prohibit dealing with another entity that provides services to shell banks Yes 49.d Prohibit opening and keeping of accounts for solutions 31	
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 46 a Money laundering 47 Are the Entity's policies and procedures updated at least annually? 48 c Sanctions violations 49 a US Standards 48 a IS Standards 49 a US Standards 49 b EU Standards 49 a US Standards 49 b EU Standards 49 a Ves 49 b EU Standards 49 b Ft', does the Entity retain a record of the results? 49 b Ft', does the Entity retain a record of the results? 49 b Does the Entity have policies and procedures that: 49 b Prohibit the opening and keeping of anonymous and fictitious named accounts 49 c Prohibit the opening and keeping of accounts for unlicensed banks and/or Yes 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 49 c Prohibit dealing with another entity that provides services	
5. POLICIES & PROCEDURES 46 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detact and report: 46 a Money laundering Yes 46 a Sanctions violations Yes 46 a Sanctions violations Yes 47 Are the Entity's policies and procedures gapped against/compared to: Yes 48 US Standards no 48 a US Standards Yes 48 b EV standards Yes 49 b EV standards Yes 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 NEFis Yes 49 c Prohibit the opening and keeping of accounts for unlicensed banks and/or NEFis Yes 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 49 d Prohibit dealing with another entity that provides services to shell bank	
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reasonably prevent, detect and report:46 aMoney launderingYes46 bTerrorist financingYes46 cSanctions violationsYes47Are the Entity's policies and procedures updated at least annually?Yes48Are the Entity's policies and procedures gapped against/compared to:no48 atUS Standardsno48 atIf Y, does the Entity retain a record of the results?Yes48 bEU StandardsYes49 bEU StandardsYes49 aProhibit the opening and keeping of anonymous and fictitious named accountsYes49 aProhibit the opening and keeping of accounts for unlicensed banks and/or NBFisYes49 cProhibit dealing with other entities that provide banking services to unlicensed banksYes49 eProhibit dealing with another entity that provides services to shell banksYes49 eProhibit dealing with another entity that provides services to shell banksYes49 eProhibit dealing with another entity that provides services to shell banksYes49 eProhibit dealing with another entity that provides services to shell banksYes49 eProhibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, cas deno	
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: Image: Sanctions violations 48 a US Standards no 48 a US Standards no 48 b EU Standards Yes 48 b EU Standards Yes 48 b1 If Y, does the Entity retain a record of the results? Yes 49 b Does the Entity retain a record of the results? Yes 49 c Prohibit the opening and keeping of anonymous and fictitious named accounts Yes 49 a accounts Yes 49 c 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 dealing with another entity that provides services to shell banks Yes 49 e Prohibit dealing with another entity that provides services to shell banks Yes 49 f<	
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48 a US Standards no 48 a1 If Y, does the Entity retain a record of the results? Yes 48 b1 If Y, does the Entity retain a record of the results? Yes 49 Does the Entity have policies and procedures that: Yes 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 opening and keeping of accounts for Section 311 designated antities Yes 49 g Prohibit opening and keeping of accounts for any of unlicensed banks Yes	
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48 a1 If Y, does the Entity retain a record of the results? Yes 48 b1 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: Yes 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 opening and keeping of accounts for Section 311 designated entities Yes 49 f Prohibit opening and keeping of accounts for any of unlicensed honks, casa de Yes	
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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 e 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 no	
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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 no	
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 no	
entities ent	······
unlicensed/unregulated remittance agents, exchanges houses, casa de	
cambio, bureaux de change or money transfer agents	
49 h Assess the risks of relationships with PEPs, including their family and close Yes associates	

49 i		
421	Define escalation processes for financial crime risk issues/potentially	all employees are instructed to directly inform AML Officer
49 j	suspicious activity identified by employees Define the process, where appropriate, for terminating existing customer	Terminations decided by AML Officer with duration of max. 2 months
49 k	relationships due to financial crime risk Define the process for exiting clients for financial crime reasons that	After cancelling all accounts customer data are blocked
79 K	applies across the entity, including foreign branches and affiliates	Anter canceding at accounts customer data are ptocked
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 ore negative 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?	Less than 5 years
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
	Client Product	Yes Yes
54 b	Product	Yes
54 b 54 c	Product Channel	······································
54 a 54 b 54 c 54 d 55	Product	Yes Yes
54 b 54 c 54 d 55 55 a	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
54 b 54 c 55 d 55 a 55 a	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 a 55 b 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 d	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 b 55 c 55 c 55 d 55 e	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 a 55 c 55 c 55 c 55 c 55 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News	Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 c 55 c 55 d 55 c 55 f 55 g 55 f 55 f 55 g 55 h 56 a	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dillgence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 55 d 55 a 55 b 55 c 55 c 55 c 55 c 55 c 55 d 55 c 55 d 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 54 d	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 57 c 57 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Trainsaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes Y
54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 c 57 a 57 c 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media & Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Y

58 e	Training and Education	Yes
58 f	Governance	Yes
		Yes
58 g	Management Information	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
	MAX	
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 &	Yes
	SANCTIONS RISK ASSESSMENT are representative of all the LE's	
	branches	
60 a	If N, clarify which questions the difference/s relate to and the branch/es	
60 a	that this applies to.	
60 b	If appropriate, provide any additional information / context to the answers	3
	in this section.	
7 KYC C	L DD 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	Yes
	completed, e.g. at the time of onboarding or within 30 days	
64	Which of the following does the Entity gather and retain when conducting	3
	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	25%
	ownership identification ?	
67	Does the due diligence process result in customers receiving a risk classification?	Yes
	(assiduation)	
67 a	If Y, what factors/criteria are used to determine the customer's risk	
	classification? Select all that apply:	
	classification? Select all that apply:	
67 :1		
67 a1	Product Usage	Yes
67 a2	Product Usage Geography	Yes
67 a2 67 a3	Product Usage Geography Business Type/Industry	Yes Yes
67 a2	Product Usage Geography	Yes
67 a2 67 a3	Product Usage Geography Business Type/Industry	Yes Yes
67 a2 67 a3 67 a4	Product Usage Geography Business Type/industry Legal Entity type	Yes Yes Yes
67 a2 67 a3 67 a4 67 a5	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes Yes Yes
67 a2 67 a3 67 a4 67 a5	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information	Yes Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify)	Yes Yes Yes
67 a2 67 a3 67 a4 67 a5	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process?	Yes Yes Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC	Yes Yes Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process?	Yes Yes Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68 68	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at:	Yes Yes Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal.	Yes Yes Yes Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a 68 a1 68 a2 68 a3	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, Is this at: Onboarding KYC renewal Trigger event	Yes Yes Yes Yes Yes Yes No Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a1 68 a1 68 a2 68 a3 68 a4	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68 a 68 a 68 a1 68 a2 68 a2 68 a3 68 a4 68 a4	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes Yes Yes Yes Yes Yes No Yes Yes Credit application
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 68 a1 68 a1 68 a2 68 a3 68 a4	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal. Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for	Yes Yes
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a1 68 a2 68 a3 68 a4 68 a4 69	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes Yes Yes Yes Yes Yes No Yes Yes Credit application
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a1 68 a2 68 a3 68 a4 68 a4 69 a	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for adverse media/negative news? If Y, is this at:	Yes Yes Yes Yes Yes Yes No Yes Yes Credit application No
67 a2 67 a3 67 a4 67 a5 67 a6 68 68 a 68 a1 68 a1 68 a2 68 a3 68 a4 68 a4 69	Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes Yes Yes Yes Yes Yes No Yes Yes Credit application

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
	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 a 1	Less than one year	No
74 a2	1-2 years	High risk customers
74 a2	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 a5	Other	
75	Does the Entity maintain and report metrics on current and past periodic	Yes
76	or trigger event due diligence reviews? From the list below, which categories of customers or industries are	Yes
/6	subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
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	EDD & Restricted on a risk based approach
76 с	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
761	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 EDD & Restricted on a risk based approach
76 l	Nuclear Power Payment Service Providers	EDD & Restricted on a risk based approach EDD & Restricted on a risk based approach
76 m 76 n	Payment Service Providers 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	EDD & Restricted on a risk based approach
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 Restricted by management and documented in onboarding processes,
77	If restricted, provide details of the restriction	governance in compliance division

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	agents: Does the Entity perform an anddititonal 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. MONI	FORING & 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
8461	If "Vendor-sourced tool" or "Both" selected, what is the name of the vendor/tool?	Geno-SONAR
84 b2	When was the tool last updated?	Apr 24
84 b3	When was the automated Transaction Monitoring application last calibrated?	October 2023
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 havea 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. PAYM	I ENT TRANSPARENCY	1
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

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 crimina code ("Strafgesetzbuch"), EU regulation 2015/847 on information accompanying transfers of funds ("EU-Geldtransferverordnung", former regulation EU 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	Yes
	TRANSPARENCY are representative of all the LE's branches	
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. SANC	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management	Yes
	regarding compliance with sanctions law applicable to the Entity,	
	including with respect its business conducted with, or through accounts	
	held at foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably	Yes
	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)?	
100	Does the Entity have policies, procedures or other controls reasonably	Yes
	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?	
	masking, of salicions recevant mormation in cross oordes transactions:	
101	Does the Entity screen its customers, including beneficial ownership	Yes
	information collected by the Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
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	SMARAGD and Geno-SONAR
	name of the vendor/tool?	
102 a2	When did you last test the effecitveness (of finding true matches) and	March 2024
	completeness (lack of missing data) of the matching configuration of the	
	automated tool? (If "Other" please explain in Question 110)	
103	Does the Entity screen all sanctions relevant data, including at a	Yes
	minimum, entity and location information, contained in cross border	
	transactions against Sanctions Lists?	
104	What is the method used by the Entity?	Automated

105	Does the Entity havea data quality management programme to ensure	Yes
	that complete data for all transactions are subject to sanctions screening?	
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	
407	automated screening systems against:	
107 a 107 b	Customer Data Transactions	Same day to 2 days
107 5	Does the Entity have a physical presence, e.g., branches, subsidiaries, or	immediately to next day No
100	representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
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 TRAI	INING & EDUCATION	
111	Does the Entity provide mandatory training, which includes :	
111 a	Identification and reporting of transactions to government authorities	Yes
1116	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 đ	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 112 f	Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants)	Not Applicable 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 115	If Y, how frequently is training delivered?	at least annually
	Confirm that all responses provided in the above Section are	Yes

115 a	If M closeful which supplies the difference level at the transferred to the second state of the second sta	
110 u	If N, clarify which questions the difference/s relate to and the branch/es	
445	that this applies to.	
116	If appropriate, provide any additional information / context to the answers	
10:00001011	In this section.	
	TY ASSURANCE / COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance	Yes
	programme for financial crime (separate to the independent Audit	
	function)?	
118	Does the Entity have a program wide risk based Compliance Testing	Yes
	process (separate to the independent Audit function)?	
119	Confirm that all responses provided in the above Section are	Yes
	representative of all the LE's branches	
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	Yes
	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?	
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
125 8		
123 Ь	Enterprise Wide Risk Assessment	Yes
123 с	Governance	Yes
123 c 123 d	Governance KYC / CDD / EDD and underlying methodologies	YesYes
123 c 123 d 123 e	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management	Yes Yes Yes
123 c 123 d 123 e 123 f	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information	Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing	Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g 123 h	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g 123 h 123 h	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 k 123 l	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 b 123 c 123 d 123 f 123 f 123 j 123 h 123 i 123 i 123 j 123 k 123 l 123 l	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion	Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 f 123 h 123 h 123 j 123 k 123 l 124	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 j 123 k 123 l	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 y 123 h 123 j 123 j 123 k 123 l 124 125	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 e 123 f 123 y 123 h 123 i 123 i 123 i 123 i 123 i 123 i 123 i 123 i 123 c 123 c 124 c 124 c 124 c 125 c 124 c 124 c 125 c 124 c 124 c 125 c 12	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 d 123 f 123 y 123 h 123 j 123 j 123 j 123 k 123 l 124 125 125 a	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches IF N, clarify which questions the difference/s relate to and the branch/es	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 d 123 f 123 y 123 h 123 i 123 i 123 k 123 l 124 125 125 a 126	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information / context to the answers	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 d 123 f 123 f 123 h 123 h 123 j 123 k 123 l 124 125 a 125 a 126	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Wetrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information / context to the answers in this section.	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 c 123 d 123 d 123 f 123 j 123 h 123 j 123 k 123 l 124 125 125 a 126 14. FRAUD	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches If A, Clarify which questions the difference/s relate to and the branch/se that this applies to. If appropriate, provide any additional information / context to the answers in this section.	Yes
123 c 123 d 123 d 123 f 123 y 123 h 123 i 123 i 123 k 123 l 124 125 125 a 126	Governance KYC / CDD / EDD and underlying methodologies Name Screening & List Management Reporting/Wetrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information / context to the answers in this section.	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes

129	Does the Entity have a real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to	Yes
	support ist fraud controls, for example: IP address, GPS location, and/or	
	device ID?	
131	Confirm that all responses provided in the above section, AUDIT are	Yes
	representative of all the LE's branches	
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.	
Declaratio	on Statement	
Declaratio	on Statement	
		L.4)
Wolfsberg	o <mark>n Statement</mark> g Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V3 on Statement (To be signed by Global Head of Correspondent Banking or equiv	

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.

l, 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.

VerbundVolksbank OWL eG 17:05-2024 (Signature & Date (DD/MM/YYYY))

(Signature & Date (DD/MM/YYYY) erbund