the Wolfsberg Group

Financial Institution Name: Location (Country) :

Landwirtschaftliche Rentenbank

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
		Allowel
	& OWNERSHIP	
1	Full Legal Name	
		Landwirtschaftliche Rentenbank
2	Append a list of foreign branches which are covered by	
	this questionnaire	L
		Not Applicable (No Branches)
	Full Lawel (Danietowed) Address	
3	Full Legal (Registered) Address	
		Theodor-Heuss-Allee 80, 60486 Frankfurt am Main, Germany
		Theodol-Ticuss-Alice 60, 60-60 Frankfurt an Main, Germany
4	Full Primary Business Address (if different from above)	
	\	
		Not Applicable
		· · ·
5	Date of Entity incorporation/establishment	
		04, 1,112, 4040
		01. June 1949
6	Select type of ownership and append an ownership chart	
3	if available	
<u> </u>		N.
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	No
6 C	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No No
6 d1	If Y, provide details of shareholders or ultimate	NO.
oui	beneficial owners with a holding of 10% or more	
	beneficial owners with a floiding of 10 % of filore	
7	% of the Entity's total shares composed of bearer shares	
		Not Applicable
0	Dana the Entity on any of the bounds of the bound of the bounds of the bound of the bounds of the bound of th	
8	Does the Entity, or any of its branches, operate under an	No I
	Offshore Banking License (OBL)?	
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	
		Financial Supervisory Authority (RaFin)
		 Financial Supervisory Authority (BaFin) Deutsche Bundesbank
		- Deutsche Dungespalik
11	Provide Legal Entity Identifier (LEI) if available	
		C0000070 IONOCOTTOTO
		529900Z3J0N6S0F7CT25
12	Provide the full legal name of the ultimate parent (if	
14		
	different from the Entity completing the DDQ)	Not Applicable
		The spanning of the spanning o
13	Jurisdiction of licensing authority and regulator of	
-	ultimate parent	
	·	Germany
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No

	Wolfsberg Group Co	rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
14 c	Commercial Banking	No
14 d		No
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 No
14 j	Wealth Management	No No
14 J	Other (please explain)	NO CONTRACTOR OF THE PROPERTY
14 K	Other (please explain)	
		Germany's development agency for agribusiness and rural areas (Promotional Bank)
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	I
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Greater trian \$500 million
	are representative of all the LE's branches.	No branches
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	1
18	If appropriate, provide any additional information/context to the answers in this section.	Retail Banking for (retired) employees only
2 PPODII	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Panking	No No
19 a1		NO .
19 a1a	If Y	
19 414	Does the Entity offer Correspondent Banking	No
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to	
19 810	provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with	No
19 a1d	domestic banks? 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	No
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2		No
19 a1h3		No
	-	

19 a1i	Does the Entity have processes and procedures	
		No
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No No
	,	
19 e		No No
19 f	International Cash Letter	No No
19 g		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		No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
		,
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
		No No
19 n		
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
40 =4	applicable level of due diligence:	No
19 p1	J	NO .
19 p1a	If yes, state the applicable level of due diligence	N.
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including	
	describing the level of due diligence.	1
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19.0	describing the level of due diligence.	/
19 q	describing the level of due diligence. Other high-risk products and services identified by the	/
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20 20 a 21 3. AML, C 22 22 a 22 b 22 c	describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	/ / / Yes Yes Yes
20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes Yes
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20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 e 22 f 22 g 22 i 22 j 22 j	describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
20 20 a 21 21 22 a 22 a 22 b 22 c 22 c 22 c 22 f 22 g 22 h 22 i 22 i 22 i 22 i	describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	/ / / / Yes
20 20 a 21 3. AML, C 22 a 22 b 22 c 22 c 22 g 22 h 22 g 22 h 22 g	describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section 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. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening	/ / / / Yes

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Les Sanctions Completed Leschmann Completed Leschmann Completed Employers Completed Em	23	How many full time employees are in the Entity's AML,	1.10
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public officials 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	35 c 36 37 38 38 a 39 40 40 a	receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage. Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes Yes Yes Yes Yes Yes Yes Yes / Yes
40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	35 c 36 37 38 38 39 40 40 a 40 b	receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those	Yes Yes Yes Yes Yes Yes Yes Yes Yes / Yes Yes
	35 c 36 37 38 38 39 40 40 a 40 b	receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or	Yes Yes Yes Yes Yes Yes Yes Yes Yes / Yes Yes
contributions	35 c 36 37 38 38 39 40 40 a 40 b	receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes Yes Yes Yes Yes Yes Yes Yes Yes / Yes Yes
	35 c 36 37 38 38 a 39 40 40 a 40 b	receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage Includes enhanced requirements regarding interaction with public officials? 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)? Does the Entity have controls in place to monitor the effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? If N, provide the date when the last ABC EWRA was completed. Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	Yes Yes Yes Yes Yes Yes Yes Yes Yes / Yes Yes Yes Yes

	Wollsberg Group Co	rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
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	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
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?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	1
45	If appropriate, provide any additional information/context to the answers in this section.	I
5. AML, (CTF & SANCTIONS 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	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. 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?	No
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	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

	Wonsberg Group Oc	orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for	
	terminating existing customer relationships due to	Yes
	financial crime risk	
49 k	Define the process for exiting clients for financial	L.
	crime reasons that applies across the entity, including	Yes
40.1	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle customers that were previously exited for	
	financial crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
40 =		
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
50	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	V.
	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
		E vegra er mere
		5 years or more
52	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No branches
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		/
53	If appropriate, provide any additional information/context	
00	to the answers in this section.	
		//
e vwi c.	TE & CANCTIONS DISK ASSESSMENT	
	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
54 a 54 b 54 c 54 d 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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 Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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
54 a 54 b 54 c 54 d 55 d 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 c 55 d 55 a 55 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 b 54 c 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 b 54 c 54 c 54 d 55 55 a 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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?	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 b 54 c 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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
54 a 54 b 54 c 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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
54 a 54 a 54 b 54 c 54 d 55 c 55 a 65 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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
54 a 54 a 54 b 54 c 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 b 54 c 54 c 54 d 55 c 55 a 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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:	Yes Yes Yes Yes Yes Yes Yes Yes Y
54 a 54 b 54 c 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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: Customer Due Diligence	Yes
54 a 54 b 54 c 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 a 57 d 58 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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: Customer Due Diligence Governance	Yes
54 a 54 b 54 c 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client 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: Customer Due Diligence	Yes

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58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59 g	Has the Entity's Sanctions EWRA been completed in the	
00	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	No branches
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		,
61	If appropriate, provide any additional information/context	
•.	to the answers in this section.	
		//
7. KYC, C	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 completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	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	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	25%
	to beneficial ownership identification?	2570
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
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?	
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
	, ,,p, 3410.	
]/
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
	Try : II: I	
69 a	If Y, is this at:	W.
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	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?	Yes
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	Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3 74 a4	3 – 4 years 5 years or more	
74 a4 74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	Depending on the risk rating: For customers with risk classification "high", a time period of 2 years is usually specified. For customers with risk classification "normal", a time period of 10 years is usually specified. For customers with a risk classification of "low", a time period of 15 years is usually specified.
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?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	Prohibited
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Prohibited
76 d	Extractive industries	Prohibited
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	Prohibited
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	Prohibited
76 k	Non-resident customers	Prohibited Prohibited
76 I	Nuclear power Payment Service Providers	Prohibited
76 m 76 n	PEPs Providers	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Prohibited
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Prohibited
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Prohibited
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	Prohibited
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	,
77	If restricted, provide details of the restriction	Question 76f, 76n, 76o, 76p: In addition, also restricted according to a risk-based approach. Restricted business relationships require a special approval of senior management/AML officer and additional information about the client and increased monitoring.
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional 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	No branches
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	,
		1
82	If appropriate, provide any additional information/context	Question 76a-y: Explicitly prohibited or excluded due to the business purpose as a promotional bank
	to the answers in this section.	(agribusiness)
		Question 78: Depending on the facts of the case or risk potential.
		Question 79: No application. Do not have this category of customer or industry.
8. MONITO	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
0.4	of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
		employee accounts only
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	
	144	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report	Yes
9F a	suspicious transactions?	· · ·
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	V _a .
	programme to ensure that complete data for all	Yes
88	transactions are subject to monitoring? Does the Entity have processes in place to respond to	
55	Request For Information (RFIs) from other entities in a	Yes
	timely manner?	
89	Does the Entity have processes in place to send	· · · · · · · · · · · · · · · · · · ·
	Requests for Information (RFIs) to their customers in a	Yes
90	timely manner? Confirm that all responses provided in the above Section	
90	are representative of all the LE's branches	No branches
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
		<i>'</i>
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
		<i>u</i>
	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Yes
	Transparency Standards?	

93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to	
	ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	
	, -p,	Geldtransferverordnung (GTVO)
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of	
•	required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of	
	required beneficiary information cross-border 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	
	are representative of all the LE's branches	No branches
96 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	11	/
97	If appropriate, provide any additional information/context	
	to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law	
	applicable to the Entity, including with respect to its	Yes
	business conducted with, or through accounts held at	
	foreign financial institutions?	
99	Does the Entity have policies, procedures, or other	
33		
	controls reasonably designed to prevent the use of	
	another entity's accounts or services in a manner	Yes
	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 designed to prohibit and/or detect	
	actions taken to evade applicable sanctions prohibitions,	Yes
	such as stripping, or the resubmission and/or masking,	1100
	of sanctions relevant information in cross border	
	transactions?	
101	Does the Entity screen its customers, including beneficial	
	ownership information collected by the Entity, during	
	onboarding and regularly thereafter against Sanctions	Yes
	Lists?	
102	What is the method used by the Entity for sanctions	Both Automated and Manual
	screening?	Doi: Natomated and Ivianual
102 a	If 'automated' or 'both automated and manual'	
	selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected,	
	what is the name of the vendor/tool?	agree 21 (Automated) / Info4c (Manual)
		ragroo z r (matoritatea) / into+o (manuar)
102 a2	When did you last test the effectiveness (of finding	
-	true matches) and completeness (lack of missing	e 1 year
	data) of the matching configuration of the	< 1 year
	automated tool? (If 'Other' please explain in	
103	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location information,	Yes
	contained in cross border transactions against Sanctions	1100
	Lists?	
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management	V
	programme to ensure that complete data for all	Yes
400	transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its	
106 -	sanctions screening processes: Consolidated United Nations Security Council	
106 a	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	
.00 0	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT	N
-	(OFSI)	Not used
	,	

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	Not used
106 f	Other (specify)	
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 business days
107 b	Transactions	Same day to 2 business days
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	No
	or G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	
100	are representative of all the LE's branches	No branches
109 a	If N, clarify which questions the difference/s relate to	
.00 4	and the branch/es that this applies to.	
	and the branen, so that the applies to.	
110	If appropriate, provide any additional information/context	Outstier 404/400/407a. Caractics of applicate (also suptember) is substanted during the orthogonism
	to the answers in this section.	Question 101/106/107a: Screening of employees (also customers) is automated during the onboarding.
		Due to the business model, the business customers are almost exclusively supervised financial institutions in
		Germany and Europe - The onboarding screening for this customers is carried out using a risk-based approach.
11. TRAININ	G & 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	Yes
	the types of products and services offered	
111 c	Internal policies for controlling money laundering,	Yes
	terrorist financing and sanctions violations	Tes
111 d	New issues that occur in the market, e.g. significant	Yes
	regulatory actions or new regulations	
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	Not Applicable
	been outsourced	· · · · · · · · · · · · · · · · · · ·
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	Vec.
	risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML,	
117	CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section	<u> </u>
	are representative of all the LE's branches	No branches
	para representativo er all tro EE a bitalionea	

	Wollaberg Group Oc	orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
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.	
	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Voc
	the independent Audit function)?	165
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
119	independent Audit function)? Confirm that all responses provided in the above Section	
119	are representative of all the LE's branches	No 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	
121	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent	Yes
	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 Does the internal audit function or other independent	Yearly
123	third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
	procedures	
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes 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 123 i	Technology Transaction Monitoring	Yes Yes
123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
101		
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
	tracked to completion and assessed for adequacy and completeness?	100
125	Confirm that all responses provided in the above section	No branches
40.	are representative of all the LE's branches	ino pranonos
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchives that this applies to.	/
126	If appropriate, provide any additional information/context	
	to the answers in this section.	
		/
14. FRAUE		
127	Does the Entity have policies in place addressing fraud	Yes
400	risk?	1.00
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
	Ibrosommid a acrosmid mana:	I .

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No 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.	Only relevant for retail banking, which as described in question 18 is only available to (retired) employees.

Declaration Statement

Deciaration 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)			
Landwirtschaftliche Rentenbank every effort to remain in full compliance with all applicable fi	(Financial Institution name) is fully committed to the fight against financial crime and makes nancial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution 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.			
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.			
The Financial Institution further certifies it complies with / is working to comply 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 every eighteen months.			
The Financial Institution commits to file accurate supplemental information on a timely basis.			
Diane Schröder, AML Officer I, provided in this Wolfsberg CBDDQ are complete and corre	(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers ct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
Kevin Lienig, Deputy AML Officer (MLRO or equivalent), 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 the Financial Institution.			
15/04/24 (Signature & Date)			
i.V. Wein Juny 15.04. Ca	(Signature & Date)		
/			