



Financial Institution Name:

VTR Bank (Europe) SE

Location (Country):

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 CRDDQ 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.

Key	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	VTR Bank (Europe) SE
2	Append a list of foreign branches which are covered by this questionnaire	VTR Bank (Europe) SE Zweigstelle am Markt
3	Full Legal (Registered) Address	VTR Bank (Europe) SE Steinweg 2-6 70000 Plochingen/Alb
4	Full Primary Business Address (if different from above)	NA
5	Date of Entity Incorporation/establishment	11.11.1971
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 ticker or symbol	
6b	Member Owned/Mutual	No
6c	Government or State Owned (≥ 25% or more)	Yes
6d	Privately Owned	No
6d1	If 'Y', provide details of ownership and names of beneficial owners with a holding of 10% or more	
7	Are all the Entity's total shares composed of common shares	100% non-voting preferred shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8a	If 'Y', provide the name of the relevant branches which operate under an OBL	
9	Name of primary financial regulator/supervisor authority	BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht (Federal Financial Supervisory Authority)

10	Provide Legal Entity identifier (LEI) if available	02700010008800047925
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the CDD)	SVE Bank (PJSC) St.Petersburg Percentage of ownership (S) 99.92%
12	Jurisdiction of licensing authority and regulator of ultimate parent	The Central Bank of the Russian Federation
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	Yes
13 d	International Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets trading	Yes
13 g	Securities Services / Custody	No
13 h	Insurance / Reins	No
13 i	Multi-currency Development Bank	No
13 j	Other	
14	Does the Entity have a significant (10% or more) portion of non-resident or offshore or does it derive more than 10% of its revenue from non-resident customers? (non-resident means non-shares primarily resident in a different jurisdiction to the location where core services are provided.)	Yes
14 a	If 'Y', provide the top five countries where the non-resident customers are located	Russian Federation, Cyprus, United Kingdom of Great Britain and Northern Ireland, Netherlands, ITA
15	Select the closed nodes	
15 a	Number of employees	201 600
15 b	Total Assets	EUR 24.0bn as of March 31st, 2019
16	Confirm that all responses provided in the above Section 10-15 by the COMPLETER are representative of all the LE's branches	Yes
17 a	FN, clarify which questions the differences relate to and the branches that this applies to.	
17 b	If appropriate, provide any additional information / comment to the responses in this section.	

2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services?	
17 a	Correspondent Banking	Yes
17 a1	FTY	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to provide correspondent relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify down of call relationships with correspondent banks?	Yes
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow down stream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify down stream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSB's/MTS?	No
17 a9	Does the Entity allow down stream relationships with MSB's/MTS?	No
17 a10	Does the Entity have processes and procedures in place to identify down stream relationships with MSB's/MTS?	Yes
17 b	Private Banking (Private & Ultra-High Net)	No
17 c	Trade Finance	Yes
17 d	Payments Through Accounts	No
17 e	Shared Value Relationships	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remittance Deposit Options	No
17 j	Virtual/Digital Outlets	No
17 k	Local Issue Securities	No
17 l	Hold Mail	No
17 m	Cross Border Remittance	Yes
17 n	Service to walk-in customers (from account holder)	No
17 o	Blockchain/Fintech A/B/Cs	No
17 p	Other high risk products and services identified by the Entity	No
18	Can the listed high risk services provided in the entire Section PRODUCTS & SERVICES and representative of all the LE's branches	Yes
18 a	If "N", clarify which questions the differences relate to and the reasons why they do not apply to:	
18 b	If applicable, provide any additional information relevant to the answers in this section.	Correspondent Banking services are provided by Fund at least of low risk

3. AML, CTF & SANCTIONS PROGRAMME		
18	Does the Entity have a program that sets minimum AML, CTF and Sanctions standards regarding the following components:	
18 a	Appointed Officers with defined expectations regarding:	Yes
18 b	Cost Reporting	Not Applicable
18 c	ODD	Yes
18 d	ITX1	Yes
18 e	Beneficial Ownership	Yes
18 f	Independent Testing	Yes
18 g	Periodic Review	Yes
18 h	Threats and Priorities	Yes
18 i	Risk Assessment	Yes
18 j	Sanctions	Yes
18 k	PEP Screening	Yes
18 l	Access to International Screening	Yes
18 m	Suspicious Activity Reporting	Yes
18 n	Training and Education	Yes
18 o	Transaction Monitoring	Yes
20	How many full-time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved or endorsed, orally by the Board or equivalent (Banking Management Committee)?	Yes
22	Does the Board or equivalent (Banking Management Committee) receive regular reporting on the status of the AML, CTF & Sanctions programme?	Weekly
23	Does the Entity use third parties to verify any components of its AML, CTF & Sanctions programme?	Yes
23 a	IF "Yes" provide further details:	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches.	Yes
24 a	If "No" clearly which questions the differences relate to and the reasons for this response.	
24 b	If applicable, provide any additional information / context to the answers in this section.	

4. ANTI BRIBERY & CORRUPTION		
25	Has the Entity's governance policies and procedures consistent with applicable ABC regulations and requirements to (a) identify, assess, prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an external anti-bribery programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have awareness staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? (a) includes receiving, offering, giving, solicitation or causing of any bribe, whether directly or indirectly, if it properly funded to influence an individual in an advantage.	Yes
30 b	Includes enhanced measures to receiving information with public officials?	Yes
30 c	Includes prohibitions against the facilitation of bribes and records of the measures with the ABC policy or any other policy applicable to the Entity?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of the ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment? If	Yes
33 a	IFY select the frequency	12 months
34	Does the Entity have an ABC residual risk rating that is the result of the risk-benefit assessment and the inherent risk assessment? If	Yes
35	Does the Entity's ABC EWRA cover the identified risk components detailed below:	
35 a	Potential liability created by intermediaries and other third party payees as appropriate	Yes
35 b	Compliance risks associated with the countries and businesses in which the Entity does business, directly or through intermediaries	Yes
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Compliance risks associated with gifts and hospitality, through business or charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's compliance risk	Yes
36	Does the Entity's Internal Audit function or other independent third party review ABC risk control Procedures?	Yes

37	Does the Entity provide mandatory AML training to:	
37 a	Board of Directors/Committee Management	Yes
37 b	1st Line of Defense	Yes
37 c	2nd Line of Defense	Yes
37 d	3rd Line of Defense	Yes
37 e	3rd parties to which specific compliance activities subject to AML risks are loaned out/contracted	No Response
37 f	Non-empLOYed workers to operate core non-financial products	Yes
38	Does the Entity provide AML training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Money & Corruption are representative of all the LEA branches	Yes
39 a	P.N. Clarify which question in the feedback refers to and the branches that this applies to	
39 b	If appropriate, provide any additional information / context to the answers in this section	

5. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
40	Are the Entity's documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures required to be approved by senior management?	
42 a	US Standards	No
42 a1	If Y, does the Entity retain a record of the "waiver"?	Not Applicable
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the "waiver"?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of accounts with and facilities related to persons	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NEFBs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit account relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 501(c)(3) tax-exempt entities	
43 g	Prohibit opening and keeping of accounts for any of the following regulated non-bank entities: exchanges, houses, case de cambio, bureaux de change or money transfer agents	Yes
43 h	Assess the risks of relationships with domestic and foreign FDIIs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for assessing providing customer-related services due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 l	Outline the processes regarding screening the sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "blacklists"	Yes
44	Has the Entity defined a non-tolerance statement or similar document which sets a clear boundary around their business?	Yes
45	Does the Entity have a record report on procedures for using third-party due diligence?	Yes
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section 40-45 & 48(a)-(b) are true and represent a true view of all the LE's business	Yes
46 a	PN: Clarify which questions the Office needs to follow and the branches that this applies to	
46 b	If appropriate, provide any additional information pertinent to the answers in this section	To 43 f: German and EU law is applicable for VTB. However, VTB documentation business information is not dedicated and the goal is to be in line 141

6. AML, CTF & SANCTIONS RISK ASSESSMENT		
47	Does the Entity's AML & CTF EWFA cover the in-scope risk components listed below?	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWFA cover the controls effectiveness controls listed below?	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative Lists	Yes
48 f	Training and Education	Yes
48 g	Compliance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWFA been completed in the last 12 months?	Yes
49 a	If No, provide the date when the last AML & CTF EWFA was completed	10/18/2024
50	Does the Entity's Sanctions EWFA cover the in-scope risk components listed below?	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes



61	Review the Multiple Selections EWRAs, and the corresponding business components detailed below:	
61 a	Customer Due Diligence	Yes
61 b	Inspection Screening	Yes
61 c	Sanctions Screening	Yes
61 d	Self Management	Yes
61 e	Training and Education	Yes
61 f	Compliance	Yes
61 g	Management Information	Yes
62	Has the Entity's Financial EWRAs been completed in the last 12 months?	Yes
62 a	If "N", provide the date when the last financial EWRAs was completed.	30.09.2019 (the annual document is 49)
63	Declare that all responses provided in the above Section 466, C.F.R. PART 1180 (RISK ASSESSMENT) are representative of all the U.S. members.	Yes
63 a	If "N", clarify which questions the differences relate to and be inclusive that this applies to.	
63 b	If appropriate, provide any additional information relevant to the answers in this section.	

7. KYC, GDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the start of onboarding or wider strategy?	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply.	
56 a	Ownership structure	Yes
56 b	Qualitative information	Yes
56 c	Expected activity	Yes
56 d	Source of cash/working capital	Yes
56 e	Prod. of origin	Yes
56 f	Purpose and nature of the relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified?	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key contacts	Yes
57 d	Other relevant parties	Yes
58	Where is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? *	25%
59	Does the due diligence process result in customers requiring a risk assessment?	Yes

50	If 'Y', what factors/inputs are used to determine the customer's risk level (name)? Select all that apply:	
50 a	Product Usage	Yes
50 b	Geography	Yes
50 c	Business Type/Industry	Yes
50 d	Legal Entity type	Yes
50 e	Adverse Information	Yes
50 f	Other (specify):	Yes
51	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
52	If 'Y', is this of:	
52 a	Onboarding	Yes
52 b	KYC renewal	Yes
52 c	Trigger event	Yes
53	What is the method used by the Entity to screen for adverse media/negative news?	Combination of automated and manual
54	Does the Entity have a risk based approach to screening customers and associated parties to determine whether they are PEPs, or controlled by PEPs?	Yes
55	If 'Y', is this of:	
55 a	Onboarding	Yes
55 b	KYC renewal	Yes
55 c	Trigger event	Yes
56	What is the method used by the Entity to screen PEPs?	Automated
57	Does the Entity have a process, manual, manual, or automated, to review and associate potential matches from screening customers and associated parties to determine whether they are PEPs, or controlled by PEPs?	Yes
58	Does the Entity have a process to review and update customer information based on:	
58 a	KYC renewal	Yes
58 b	Trigger event	Yes
59	Does the Entity maintain and report records of current and past records on trigger event due diligence reviews?	Yes

70	From the list below, which categories of customers or accounts are subject to EDD and/or a risk check, as permitted by the Entity's EDD programme?	
70 a	Non-account customers	Prohibited
70 b	Non-credit customers	EDD on a risk-based approach
70 c	Shell banks	Prohibited
70 d	MSB/KBS customers	Prohibited
70 e	PEPs	EDD on a risk-based approach
70 f	PEP Relatives	EDD on a risk-based approach
70 g	PEP Close Associates	EDD on a risk-based approach
70 h	Consequential clients	EDD on a risk-based approach
70 hi	If EDD or EDD-S restricted, does the EDD assessment contain the elements as set out in the Available Consequential Clienting Principles 2014?	Yes
70 i	Arms, defence, military	Do not have the category of customer or industry
70 j	Atomic power	Do not have the category of customer or industry
70 k	Extractive Industries	EDD on a risk-based approach
70 l	Financial markets and shares	EDD-S restricted on a risk-based approach
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	Prohibited
70 o	Red light business (Adult entertainment)	Prohibited
70 p	Non-Government Organisations	Do not have the category of customer or industry
70 q	Virtual currencies	Prohibited
70 r	Karaoke	Prohibited
70 s	Entertainment venues	Do not have the category of customer or industry
70 t	Gambling	EDD-S restricted on a risk-based approach
70 u	Payment Provider Provider	Do not have the category of customer or industry
70 v	Other (specify)	
71	Excluded, provide details of the restriction	Restricted business real credits are subject to NLRB Approval and the restricted policy
72	Does the E.U. type form an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the E.U. branches	Yes
78 a	P.N. clarify which questions the office checks relate to and the branches that this applies to	
73 b	Explain any, provide any additional information just to their own in the sections	

8. MONITORING & REPORTING		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activity?	Automated
76	If manual or controls review is used, specify what type of controls are used to review manually.	
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If 'Yes' does the Entity have policies, procedures and processes to comply with regulatory transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of suspicious transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are approved by Board of Directors	Yes
79 a	If 'No', clearly explain reasons for differences (check to and the reasons for that discrepancy)	
79 b	If appropriate, provide any additional information relevant to the answers in this section.	

B. PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Fed Interagency Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to (possibly) comply with and have controls in place to ensure compliance with the FATF Recommendation 15?	Yes
81 a	Local Regulations	Yes
81 b	Specify the regulation	REGULATION (EU) 2015/849
81 c	FIN reports	
82	Does the Entity have processes in place to respond to (req. req. for) internal or (RFIs) from clients that is clearly marked?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate payment information in internal and payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary information in international payment messages?	Yes
85	Confirm that all measures provided in the above Section PAYMENT TRANSPARENCY are representative of all the U.S. branches	Yes
85 a	If No, identify which countries the differences relate to and the laws that they apply to	
85 b	If appropriate, provide any additional information / context to the answers in 85 a (if any)	

10. SANCTIONS		
80	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to business conducted with or through various banks of foreign financial institutions?	Yes
87	Does the Entity have policies, procedures or other controls reasonably designed to prevent the use of another entity's services or services in a manner that will if the other entity in question best have prohibitions applicable to the other entity including prohibitions within the other entity's local jurisdiction?	Yes
88	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or restrict others from providing applicable sanctions prohibitions, guidance or other information and/or trading of securities with an institution in cross border transactions?	Yes
89	Does the Entity screen its customers, including based on ownership information collected by the Entity, using procedures that regularly refer to the Sanctions Lists?	Yes
90	What is the tool used by the Entity?	Automated
91	Does the Entity possess all sanctions relevant data, including, at a minimum, entity and location information, contained in each source for screening against Sanctions Lists?	Yes
92	What is the method used by the Entity?	Automated
93	Select the Sanctions Lists used by the Entity in its sanctions screening process:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filing beneficial data
93 b	United States Department of the Treasury (Office of Foreign Assets Control (OFAC))	Used for screening customers and beneficial owners and for filing beneficial data
93 c	Office of Financial Sanctions Implementation (OFSI)	Used for screening customers and beneficial owners (but not beneficial data)
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filing beneficial data
93 e	Database used by other UN member countries	Used to identify customers and beneficial owners (i.e. reference data)
93 f	Other (specify)	
94	Question reserved	
95	When regulatory authorities make updates to the Sanctions List, how many business days before the update notifies the relevant customer and/or automated screening systems against:	
95 a	Customer Data	Same day to 3 business days
95 b	Beneficial data	Same day to 2 business days

96	Does the entity have a physical presence (e.g., branch, subsidiary, or representative office) located in countries/regions/territories which UN, OHCHR, ILO, ILO EJ and ILO member countries have issued comprehensive jurisdiction-based Sanctions?	No
97	I confirm that all responses provided in the above Section 5 SANCTIONS are representative of all the LE's business.	Yes
97 a	If 'No', clarify which questions the offences relate to and the jurisdiction that this applies to.	
97 b	If appropriate, provide any additional information requested in the answers in this section.	



11. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes:	
98 a	Identification and reporting of breaches to government authorities	Yes
98 b	Issuance of different forms of money laundering, terms of financing and conditions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering associated financing and conditions violations	Yes
98 d	How secure the assets in the market, e.g. digital assets, regulatory solutions or new regulations	Yes
99 a	Conduct and Culture	Yes
99	In the scope of security training provided to:	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCG activities have been outsourced	Yes
99 f	Non-employee workers (contractors, etc.)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, regions/banks and financial products, services and activities?	Yes
101	Does the Entity provide customized training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the section Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If a country which questions the differences table around the branches that do not apply to:	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QUALITY ASSURANCE / COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the Entity's branches.	Yes
103 a	If "No", identify which questions the Office assesses subject to and the branches that this applies to.	
103 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AUDIT		
106	In addition to inspections by the government supervisory authorities, does the E.U. have an internal audit function, including function of an independent third party, which has assessed the AML, CTF and Sanctions policies and procedures in compliance?	Yes
107	How often is the E.U. member on the AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Continuous based review
107 b	External Third Party	Yearly
108	Does the internal, third party or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying mechanisms	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening / Filtering / Sanctions	Yes
108 e	Human Resources & Case Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Regulatory Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 l	Other (specify):	Yes
109	Are advice to findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the E.U. branches	Yes
110 a	If N, clarify which questions the differences relate to and the branches that this applies to.	
110 b	If appropriate, provide any additional information related to the answers in this section	

**Declaration Statement**

Wolfsberg Group Compliance Reporting Due Diligence Questionnaire (CRDDQ) V1.3  
This and all information to be signed by Global Head of Compliance Reporting or equivalent, could be held by WBG Group (Group) Leadership, Prevention Office, Global Head of Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crime Compliance (FCR) or relevant

I, Alexander Rest (Name) (Function) of Wolfsbank AG, hereby confirm that I have read and understood the CRDDQ and I declare that I have provided all the information requested in the CRDDQ and I have provided all the information requested in the CRDDQ and I have provided all the information requested in the CRDDQ.

The Financial Institution understands the critical importance of having robust and accurate information on Wolfsbank AG to protect its reputation and to ensure appropriate reporting obligations.

The Financial Institution recognizes the importance of transparency regarding not only its own risk management practices but also its relationship with Wolfsbank AG.

The Financial Institution further declares that it is working to comply with the Wolfsbank Group's Compliance Reporting Policy and the Wolfsbank Group's Ethics Principles. The information provided in this Wolfsbank CRDDQ will be kept confidential and will be updated on a regular basis.

The Financial Institution commits to follow the suggestions of Wolfsbank AG in this regard.

Alexander Rest (Global Head of Compliance Reporting) hereby confirms that I have read and understood the CRDDQ and I declare that I have provided all the information requested in the CRDDQ and I have provided all the information requested in the CRDDQ.

Sebastian Glaab (WIRG or equivalent) hereby confirms that I have read and understood the CRDDQ and I declare that I have provided all the information requested in the CRDDQ and I have provided all the information requested in the CRDDQ.

Alexander Rest (Signature & Date)  
**Sebastian Glaab**  
Division Head of  
AML Compliance  
Director *[Signature]*