The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.
13. Does the FI have a requirement to collect information regarding its customers' business activities? | Y ☒ | N ☒ |
14. Does the FI assess its FI customers' AML policies or practices? | Y ☒ | N ☒ |
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? | Y ☒ | N ☒ |
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information? | Y ☒ | N ☒ |
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? | Y ☒ | N ☒ |

**IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds**

18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? | Y ☒ | N ☒ |
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? | Y ☒ | N ☒ |
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? | Y ☒ | N ☒ |
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin? | Y ☒ | N ☒ |
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? | Y ☒ | N ☒ |

**V. Transaction Monitoring**

23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc? | Y ☒ | N ☒ |

**VI. AML Training**

24. Does the FI provide AML training to relevant employees that includes:
   - Identification and reporting of transactions that must be reported to government authorities.
   - Examples of different forms of money laundering involving the FI's products and services.
   - Internal policies to prevent money laundering. | Y ☒ | N ☒ |
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used? | Y ☒ | N ☒ |
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees? | Y ☒ | N ☒ |

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27. Does the FI employ third parties to carry out some of the functions of the FI?  
   | Y o | N ☐ |

28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes:
   - Identification and reporting of transactions that must be reported to government authorities.
   - Examples of different forms of money laundering involving the FI’s products and services.
   - Internal policies to prevent money laundering.  
   | Y o | N o |

Space for additional information:  
(Please indicate which question the information is referring to.)

Name: Cornelia Schmickal  
Title: Geldwäschebeauftragte (AML-Officer)  
Signature: 

Date: 22.08.2018