the Wolfsberg Group

Financial Institution Name: Location (Country) : Fondsdepot Bank GmbH Germany

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	French das et Basels Oscilit
	-	Fondsdepot Bank GmbH
2	Append a list of foreign branches which are covered	Fandadarat Barla Orabili Minde da di lancara di 0.05000 list
	by this questionnaire	 Fondsdepot Bank GmbH, Windmühlenweg 12, 95030 Hof Fondsdepot Bank GmbH bei Campus Königsplatz, Brienner Str. 45 a-d, 80333 München
		- Fondsdepot Bank GmbH bei WeWork, Taunusanlage 8, 60329 Frankfurt am Main
3	Full Legal (Registered) Address	
		Windmühlenweg 12 95030 Hof
		Amtsgericht Hof/Saale Nummer HRB 2018
4	Full Primary Business Address (if different from	
	above)	No difference from the full legal (registered) adress
5	Date of Entity incorporation/establishment	
		06/14/1993 as "GKS Gesellschaft für Kontenservice GmbH"
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	see above
	symbol	
6 b	Member Owned/Mutual	No
6 C	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	Adrian John Durham is UBO, yet not by share-holding.
		We are owned 100% by FNZ Germany Holdco Limited.
7	% of the Entity's total shares composed of bearer	7
	shares	Zero
8	Does the Entity, or any of its branches, operate under	No
	an Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	N/A
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	No
10	provide services only through online channels?	
10	Name of primary financial regulator/supervisory authority	Bundesanstalt für Finanzdienstleistungsaufsicht,
	autionty	Graurheindorfer Straße 108, 53117 Bonn
11	Provide Legal Entity Identifier (LEI) if available	
''		391200Y1C3ZJT2NUUD34
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	FNZ Group Limited

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19 a1h2 MVTSs No		with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
		MSBs	No
19 a1b3 PSPs No			No
	19 a1h3	PSPs	No

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
10 C	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	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
19 n	Trade Finance	No
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 applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	-
19 q	Other high-risk products and services identified by the Entity (please specify)	-
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
21	If appropriate, provide any additional information/context to the answers in this section.	-
3. AML, C	 TF & SANCTIONS PROGRAMME	
3. AML, C 22	TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes Yes
22 22 a	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	
22 22 a 22 b	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes
22 22 a 22 b 22 c	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership	Yes Yes
22 a 22 b 22 c 22 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes
22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes
22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes
22 a 22 a 22 b 22 c 22 c 22 c 22 e 22 f 22 g 22 h	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes
22 a 22 a 22 b 22 c 22 c 22 c 22 e 22 f 22 g 22 h 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes
22 22 a 22 b 22 c 22 c 22 c 22 c 22 f 22 g 22 f 22 g 22 h 22 i 22 j	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes

22 m	Suspicious Activity Poparting	Vac
22 m 22 n	Suspicious Activity Reporting Training and Education	Yes
22 n 22 o	Transaction Monitoring	Yes
22 0	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Yes 1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	-
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
29	If appropriate, provide any additional information/context to the answers in this section.	-
	RIBERY & CORRUPTION	
4. ANTI E	Has the Entity documented policies and procedures	
50	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	•
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

60 B. Comption reak associated with the cumines and industrial in which the First Yook business, ended. Yoo 61 C. Transcrings modules or removals, inducing three or public disata 62 G. Comption reak associated with the sub- or public disata 63 G. Comption reak associated with the sub- or public disata 64 G. Comption reak associated with the sub- modules. Interpleter helps, thereing and public disata 64 G. Comption reak associated with the sub- modules the Christ or public disata 64 G. Comption reak associated with the sub- modules the Christ or public disata 64 G. Comption reak associated with the sub- modules the Christ or public disata 64 G. Comption reak associated with the sub- modules the Christ or public disata 64 G. Context or Entity in the sub- modules the Christ or public disata 64 G. The comption reak associate 65 Genome and sub- comptione associate Yes 64 G. Context the sub- sociation with sub- disata Yes 64 Good multiple the sub- sociation with sub- sociation with the sub- sociation with sub- soc			
Interviewe state-owned or state-concelled entities of the state o	40 b	industries in which the Entity does business, directly	Yes
Indepinite integration within the constance of the integration within the integration of the integration	40 c	that involve state-owned or state-controlled entities	Yes
Increase the Entity's formal and function or other independent third party cover ASC Policies and Procedures? Yee 42 Does the Entity provide mandatory ASC training to: 42 South or entity provide mandatory ASC training to: 42 Image: Comparison of the Comparison of	40 d	hospitality, hiring/internships, charitable donations	Yes
Independent find party over ABC Policies and Proceedures? Yes 42 Does the Entity provide mandatory ABC training to: International Construction Management Yes 42 Bara and secior Committee Management Yes Yes International Committee Management Yes 42 Tat Line of Defence Yes Yes Yes 42 Tat Line of Defence Yes Yes 42 Tat Line of Defence Yes Yes 43 Dose the Entity provide as a propriate to strangement Yes 44 Contractorscionsultents) Yes 45 Description that it tarsposite to strangement Yes 44 And the branches that this applies to. Yes 45 If appropriate, provide any additional information to strangement, discourd and the answers in this section. - 45 Has the EAN documented policies and procedures updated at the result documented policies and procedures updated at the resul	40 e		Yes
42 a Board and semior Committee Management Yes 42 b 151 Line of Defension Yes 43 c 2nd Line of Defension Yes 44 c 2nd Line of Defension Yes 45 d 30 Line of Defension Yes 46 d 7 Line of Defension Yes 47 e 30 Line of Defension Yes 48 e Third parties to which specific compliance activities aubject ABC risk have been outbounded to specific roles, responsibilities and activities? Yes 43 Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? Yes 44 a If N, darify which questions the adiference/s reliable to and the branchies that this applies to. Yes 45 B Rappropriate, provide any additional information context to the answere in this section. - 46 M Has the Entity documents to reasonably prevent, defect and report. Yes 46 A Terrorist finanding. Yes 47 A Are the Entity policies and procedures consistent with applicable AML. CTF & Sanctions regulations and requirements to reasonably prevent, defect and report. Yes 46 A Morey hundering Yes 47 As the Entity closent to compare its policies and procedures against. Yes 48 A U.S. Standards. Yes 49 Does the Entity relian a record the	41	independent third party cover ABC Policies and	Yes
42 b 1st Line of Defence Yes 42 c 2st Line of Defence Yes 42 d 3st Line of Defence Yes 42 d 3st Line of Defence Yes 42 e Tim Parties to which specific complance activities Yes 42 e Tim Parties to which specific complance activities Yes 42 e Tim Parties to which specific complance activities Yes 42 f Normerployed workers as appropriate to resolve and the last peried to specific coles, responsibilities and activities / Yes Yes 43 Does the Entity provides any additional information/context to the answers in this section. Yes 44 a If Appropriate, provide any additional information/context to the answers in this section. . 45 If appropriate, provide any additional information/context to the answers in this section. . 46 A Morey laundering Yes 47 As the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctons regulations and regulations and regulations and regulations and regulations and regulations and regulationed to the answers in this section. . 48 Mark Entity documented policies and procedures to and procedures to answers in this section. . 48 A May Landon and Landon and Calculate AL (Yes . 48 A Terrorist financing Yes 48 A Terrorist financing Yes 49 A	42	Does the Entity provide mandatory ABC training to:	
42 c 20 Line of Defence Yes 42 d 32 Line of Defence Yes 42 e Third parties to which specific compliance activities subject to ACI sink we been outcoursed Yes 42 f Non-employed workers as appropriate poportic roles, response provided in the above Section are representative of all the LES branches Yes 43 d Does the Entity provide AGC straining that is targeted poportic roles, response provided in the above Section are representative of all the LES branches Yes 44 a If N, darly which questions the differences relate to and the tranches that this section. - 45 If appropriate, provide any additional information/context to the answers in this section. - 46 A Mark the Entity documented policies and procedures regulations and requirements to reasonably prevent, detect and report. - 46 B Money laundering Yes 47 Are the Entity documented policies and procedures updations and requirements to reasonably prevent, detect and report. Yes 48 US Standards Yes 49 Has the Entity chosen to compare its policies and procedures against: text annually? Yes 49 To Are the Entity chosen to compare its policies and procedures against: text annually? Yes 49 Des the Entity relate a record of the results? Yes 49 Des the Entity there policies and procedures updated at text annually? Yes 49 Des the Entity there policies a	42 a	Board and senior Committee Management	Yes
42.6 3rd Line of Defense Yes 42.7 The parties to which specific compliance activities subject to ABC risk have been outsourced Yes 42.1 Noremployed workers as appropriate to specific roles, responsibilities and activities? Yes 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 LES to hanches Yes 44 If N, Carty which questions the differences relate to and the transhes that this applies to. - 45 If appropriate, provide any additional information/context to the answers in this section. - 5. AML, CT E & SANCTIONS POLICIES & PROCEDENES - 46 Money Laundening Ves 47 Are the Entity documents to reasonably prevent, detect and report. Yes 48 a Money Laundening Ves 47 Are Entity fournation Yes 48 a U.S. Standards Yes 49 Yes boolies and procedures updated at least annually? Yes 48 a U.S. Standards Yes 49 Does the Entity return a record of the result? Yes 49 Prohibit the opening and xeeping of accounts for undetabaan and difficure and accounts Yes 46 a Sanc	42 b	1st Line of Defence	Yes
42 e Third parties to which specific compliance activities 43 complexity ABC risk have been outcourced Yes 44 f Non-employed workers as appropriate Yes 43 complexity provide ABC staning that is targeted Yes 44 complexity provide ABC staning that is targeted Yes 44 complexity provide ABC staning that is targeted Yes 44 complexity provide ABC staning that is targeted Yes 44 a If N clarify which questions the difference's relate to and the tennohes that this apples to. Yes 45 If appropriate, provide any additional information clonexity to the answers in this section. - 5. AML, CTF & SANCTIONS POLICIES & PROCEDURES - 46 Mas the Entity documented policies and procedures on regulations and requirements to reasonably prevent, celect and report. - 47 Are the Entity documented policies and procedures updated at least annually? Yes 48 US. Standards Yes 49 Has the Entity retain a record of the results? Yes 48 US. Standards Yes 49 De to Standards Yes 49 De Drobit the opening and keeping of accounts for unitionand policies and procedures and procedures applicies and procedures applicies and procedures applicies and procedures updated at least annually? Yes	42 c	2nd Line of Defence	Yes
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50 -	News Concerting	
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	-
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
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 or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	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 to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Internal Research/Notes (negative news)
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69 69 a	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	Yes
69 a 69 a1	Onboarding	Vaa
69 a1 69 a2	KYC renewal	Yes
09 az	n to renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3 72	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
13	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2 74 a3	1 – 2 years	Yes
74 a3 74 a4	3 – 4 years 5 years or more	Yes Yes
74 a4 74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
		-
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	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Restricted
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Do not have this category of customer or industry
76 y	Other (specify)	
77	If restricted, provide details of the restriction	Shell banks restricted by regulator
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Compliance
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
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	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	-
8. MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	We have various indications in our indication model
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Smaragd MDS
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	-
91	If appropriate, provide any additional information/context to the answers in this section.	-
	T TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	Yes
1	Payment 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	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	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
97	If appropriate, provide any additional information/context to the answers in this section.	-
10. 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 business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
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?	Smaragd TCM
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	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 or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b 112 c	1st Line of Defence 2nd Line of Defence	Yes
112 c 112 d	3rd Line of Defence	Yes Yes
112 c	Third parties to which specific FCC activities have been outsourced	Yes
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	
114	Does the Entity provide customised training for AML, 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 are representative of all the LE's branches	Yes
	-	

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.	
	ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime	Yes
	(separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119		
119	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to	-
	and the branch/es that this applies to.	
120	If appropriate, provide any additional	
	information/context to the answers in this section.	-
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an	
	internal audit function, a testing function or other	
	independent third party, or both, that assesses FCC	Yes
	AML, CTF, ABC, Fraud and Sanctions policies and	
	practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
	•	
123	Does the internal audit function or other independent	Today
123	Does the internal audit function or other independent third party cover the following areas:	
	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 123 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 123 a 123 b	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment	Yes Yes
123 123 a 123 b 123 c	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance	Yes
123 123 a 123 b 123 c 123 d	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 123 a 123 b 123 c	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance	Yes Yes Yes
123 123 a 123 b 123 c 123 d	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 e 123 f	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management	Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 e	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 i	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 j	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 j 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 j	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 j 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 j 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 j 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 j 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 k 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit	Yes Y
123 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 k 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify)	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 123 a 123 b 123 c 123 c 123 d 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes Y
123 123 a 123 b 123 c 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 i 123 k 123 k	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above	Yes Y
123 123 a 123 b 123 c 123 c 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124 125	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 123 a 123 b 123 c 123 c 123 d 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
123 123 a 123 b 123 c 123 c 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124 125	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 123 a 123 b 123 c 123 c 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124 125	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
123 123 a 123 b 123 c 123 c 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124 125	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	Yes
123 123 a 123 c 123 d 123 d 123 d 123 f 123 j 123 i 123 k 123 l 123 k 123 l 124 125 125 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 b 123 c 123 c 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 I 124 125	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 c 123 d 123 d 123 d 123 f 123 j 123 i 123 k 123 l 123 k 123 l 124 125 125 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 c 123 d 123 d 123 d 123 f 123 j 123 i 123 k 123 l 123 k 123 l 124 125 125 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 c 123 c 123 d 123 f 123 f 123 i 123 k 123 l 124 125 125 a 126	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 c 123 c 123 d 123 f 123 f 123 i 123 k 123 l 124 125 125 a 126	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 c 123 d 123 d 123 d 123 f 123 j 123 i 123 k 123 l 123 k 123 l 124 125 125 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes Y
123 123 a 123 c 123 c 123 d 123 d 123 f 123 j 123 i 123 j 123 k 123 I 124 125 126 14. FRAUE	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes
123 123 a 123 c 123 c 123 d 123 e 123 f 123 i 123 i 123 i 123 i 123 i 123 k 123 I 124 125 125 a 126 14. FRAUE 127	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes Y
123 123 a 123 b 123 c 123 c 123 d 123 g 123 h 123 j 123 k 123 l 124 125 125 a 126 14. FRAUE	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section 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.	Yes Y

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?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
132	If appropriate, provide any additional information/context to the answers in this section.	-
Declaration Statement Wdfsberg 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) Fondsdepot Bank GmbH (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. 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. (Global Head of Correspondent Banking 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 belef, and that I		
Institution.		
I, Matthias Murr (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.		
23.02.2024 (Signature & Date) 23.02.2024 		