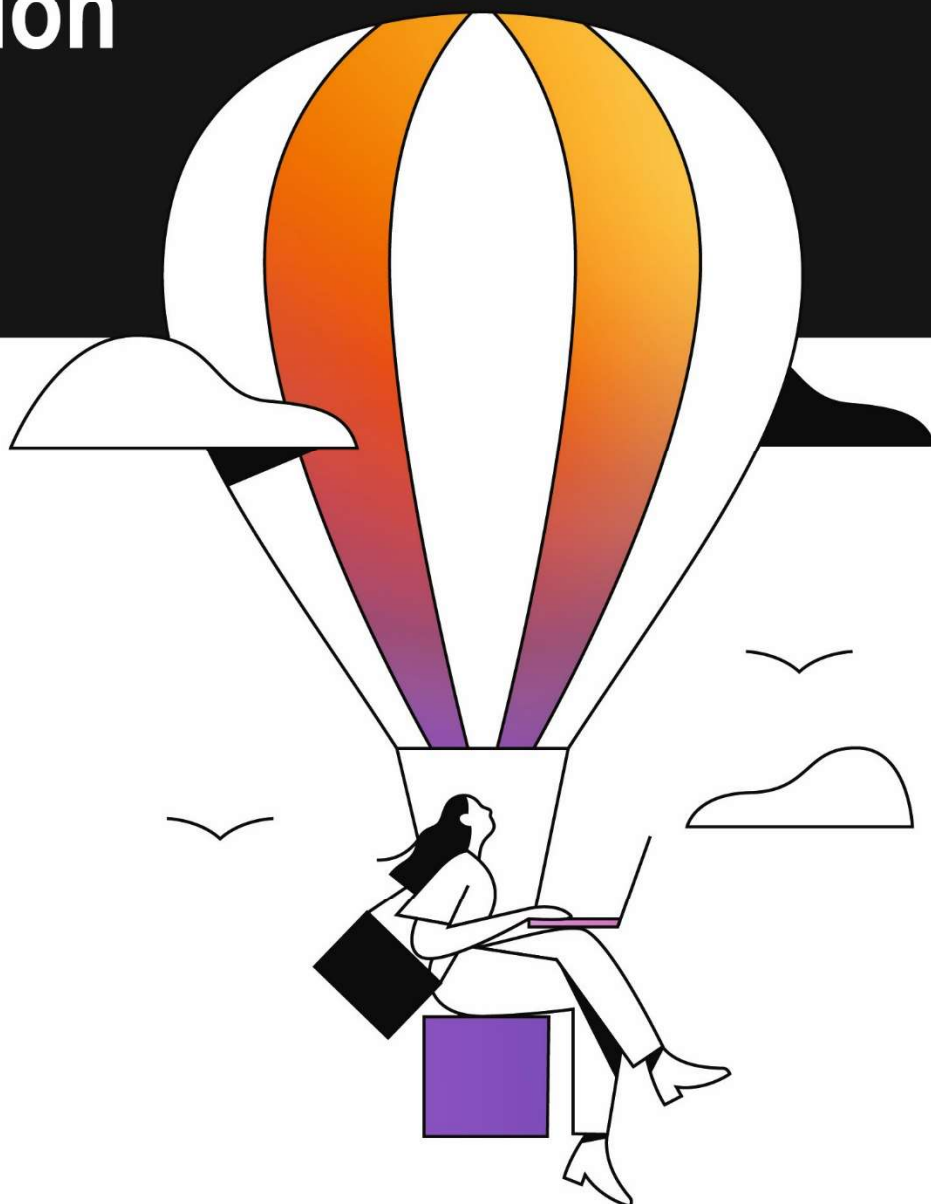


Ongoing - Distributor Due-Diligence Questionnaire / Declaration



1.	Corporate information	
1.1	Legal name:	Fondsdepot Bank GmbH
1.2	Registered address:	Windmühlenweg 12 95030 Hof Germany
1.3	Ultimate parent/holding company:	FNZ Group Limited Wellington/ New Zealand
1.4	Main contact for the questionnaire:	Name: Susi Richter Email: FodBFondsangebotsmanagement@fondsdepotbank.de
1.5	Name of Compliance Officer:	Matthias Murr, Head of Compliance
1.6	Have there been any significant corporate reorganizations affecting our company within the last three years?	There has been a merger between Fondsdepot Bank and AXA Bank in October 2021. Fondsdepot Bank left DXC Group and joined FNZ Group in 2023.

2.	Business context	
2.1	<p>What type of licenses do we hold?</p> <p>Please provide relevant evidence (such as link to official website or a copy of license):</p>	<p>Fondsdepot Bank GmbH is a Fund Platform under the German Capital Investment Code and is subject to supervision by the German regulator Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin).</p> <ul style="list-style-type: none"> - Abschlussvermittlung (§ 1 Abs. 1a Satz 2 Nr. 2 KWG) - Anlageberatung (§ 1 Abs. 1a Satz 2 Nr. 1a KWG) - Anlagevermittlung (§ 1 Abs. 1a Satz 2 Nr. 1 KWG) - Anlageverwaltung (§ 1 Abs. 1a Satz 2 Nr. 11 KWG) - Depotgeschäft (§ 1 Abs. 1 Satz 2 Nr. 5 KWG) - Eigengeschäft (§32 Abs. 1a KWG) - Einlagengeschäft (§ 1 Abs. 1 Satz 2 Nr. 1 KWG) - Factoring (§ 1 Abs. 1a Satz 2 Nr. 9 KWG) - Finanzierungsleasing (§ 1 Abs. 1a Satz 2 Nr. 10 KWG) - Finanzkommissionsgeschäft (§ 1 Abs. 1 Satz 2 Nr. 4 KWG) - Finanzportfolioverwaltung (§ 1 Abs. 1a Satz 2 Nr. 3 KWG) - Kreditgeschäft (§ 1 Abs. 1 Satz 2 Nr. 2 KWG) <p>show licenses</p>
2.2	Type of business:	<p> <input type="checkbox"/>Retail / Private Bank <input type="checkbox"/>Financial Adviser <input type="checkbox"/>Wealth Manager <input checked="" type="checkbox"/>Fund Platform <input type="checkbox"/>Family Office <input type="checkbox"/>Multi Manager / Fund of Funds <input type="checkbox"/>Insurance <input type="checkbox"/>Custodian <input checked="" type="checkbox"/>Other (please specify): Haftungsdach according to § 2 (10) KWG; Portfolio Management § 1 par. 1a KWG; Depositary institution </p>

2.3	Number of employees	<input type="checkbox"/> 0 <input type="checkbox"/> 1-5 <input type="checkbox"/> 6-50 <input checked="" type="checkbox"/> Over 50
2.4	Type of our distribution activity (related to Third Party Funds):	<input type="checkbox"/> Discretionary (<i>portfolio management</i>) <input type="checkbox"/> Fund of Fund Business <input checked="" type="checkbox"/> Advisory (<i>investment advice</i>) <input type="checkbox"/> Independent <input checked="" type="checkbox"/> non-independent <input checked="" type="checkbox"/> Execution only (<i>placing</i>)
2.5	Who are our investors?	<input checked="" type="checkbox"/> Retail <input type="checkbox"/> Professional clients <input checked="" type="checkbox"/> Eligible counterparties

3.	Information related to sub-distribution	
3.1	Do we work with sub-distributors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3.2	Which types of sub-distributors do we work with?	<div> <input checked="" type="checkbox"/> Retail / Private Bank <input checked="" type="checkbox"/> Financial Adviser <input checked="" type="checkbox"/> Wealth Manager <input checked="" type="checkbox"/> Fund Platform <input checked="" type="checkbox"/> Family Office </div> <div> <input type="checkbox"/> Multi Manager / Fund of Funds <input checked="" type="checkbox"/> Insurance <input type="checkbox"/> Custodian <input checked="" type="checkbox"/> Pension scheme / provider <input type="checkbox"/> Other (please specify): </div>
3.3	Are all our sub-distributors regulated for the purpose of fund distribution?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3.4	Do we sign an agreement with all our sub-distributors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3.5	Do we perform ongoing formal distribution due diligence with our cooperating sub-distributors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.	Sales structure and organization	
4.1	Do we maintain systems and/or procedures to comply with the laws of the domicile of the funds, distribution agreement and the provisions of the prospectus? (In terms of our own company)	<input checked="" type="checkbox"/> Yes, as far as our own company is concerned, we comply with the distribution agreement and the provisions of the prospectus. As far as there is therein a reference to provisions of a foreign law, we comply with it.

4.2	<p>Do we maintain systems and/or procedures to comply with the laws of the domicile of the funds, distribution agreement and the provisions of the prospectus?</p> <p>(In terms of our sub – distributors beyond our Haftungsdach)</p>	<input type="checkbox"/> Yes, under responsibility of the sub-distributor(s) <input checked="" type="checkbox"/> No, they are independent entities and would not accept provisions regarding systems and/ or procedures. Yet they are – by our Standard Distribution Cooperation Agreement – obliged to obey to the distribution restrictions of the prospectus.
4.3	Do we maintain systems and/or procedures to ensure compliance at the point of sale in all jurisdictions where we sell your funds?	<input checked="" type="checkbox"/> Yes, see above 4.1. <input type="checkbox"/> Yes, under responsibility of the sub-distributor(s) <input checked="" type="checkbox"/> No, see above 4.2.
4.4	Do we maintain policy and process to secure compliance with rules and regulation related to best execution?	<input checked="" type="checkbox"/> Yes, see above 4.1. <input type="checkbox"/> Yes, under responsibility of the sub-distributor(s) <input checked="" type="checkbox"/> No, see above 4.2. <input type="checkbox"/> Not applicable, as respective country is not an EU country
4.5	Have we implemented relevant ongoing distribution training and development programs for our sales force?	<input checked="" type="checkbox"/> Yes see above 4.1. <input type="checkbox"/> Yes, under responsibility of the sub-distributor(s) <input checked="" type="checkbox"/> No, see above 4.2.
4.6	Do we have procedures to deliver fund offering documents (e.g. PRIIPs-KID) to clients in accordance with applicable law (including prior to subscription where required)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.7	What type of standard fund documentation produced by fund providers do we and our distribution partners use to sell funds?	<input checked="" type="checkbox"/> Prospectus <input checked="" type="checkbox"/> PRIIPs-KID <input type="checkbox"/> Factsheet <input type="checkbox"/> Other (please specify):
4.8	Do we produce our own marketing material to sell funds?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No, only official fund documents from relevant fund companies are used
4.9	Do we maintain procedures to ensure appropriate governance over the product selection process, including escalation to our Management?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, under responsibility of the sub-distributor(s) <input type="checkbox"/> No
4.10	Do we maintain procedures ensuring initial and ongoing suitability and / or appropriateness checks between the funds offered and the customer needs and risk profile?	<input checked="" type="checkbox"/> Yes, according to MiFID II, as far as Haftungsdach and Wealth Manager is concerned <input checked="" type="checkbox"/> Yes, according to local laws, as far as Haftungsdach and Wealth Manager is concerned <input checked="" type="checkbox"/> No, not as far as our execution only business is concerned
4.11	Are suitability and /or appropriateness tests performed on a regular basis?	Yes, prior to the establishment of client relationships, annually and upon need
4.12	Do we have procedures in place to ensure that funds are not sold to non-eligible investors as per the prospectus?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (additional information must be supplied at the end of the questionnaire)

4.13	Do we maintain policies and procedures to monitor and prevent market timing and frequent trading for our clients investing in funds?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, under responsibility of the sub-distributor(s) <input type="checkbox"/> No
4.14	Can we confirm that all compensation collected in the context of our agreement complies with applicable laws?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

5	Anti-Money Laundering & Counter-Terrorism Financing	
5.1	Which AML regulations provide basic components for our company?	German AML laws and regulations based on EU AML Directives
5.2	Are our company's AML policies and procedures compliant with the latest applicable laws and regulations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.3	Are our company's AML/CTF policies approved by our Board/ our Senior Management Committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.4	Does our company have a designated Anti Money Laundering (AML) Compliance Officer responsible for coordinating and overseeing our AML program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.5	Does our AML program include oversight/monitoring to ensure that compliance is met?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.6	Is our company's AML/CTF program subject to independent testing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.7	Have there been any material findings in the last 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No, as far as findings by our internal Compliance department are concerned, regarding findings by regulators cf. below 6.11
5.8	Does our company provide AML/CTF training (internal and external) including identification and reporting of transactions, examples of different forms of money laundering and internal policies to prevent money laundering to all employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.9	Does our company apply the same AML policies and procedures to all branches and subsidiaries (including nominee companies) both within, and outside of the jurisdiction of domicile of the ultimate parent company?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.10	Do we require sub-distributors for fund distribution to certify their fulfillment of our requirements concerning AML/CTF compliance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.11	Do we screen prospective clients and persons associated with client's account, including beneficial owners, regarding their international sanctions or their appearance on watch lists, lists of politically exposed persons, and other financial sanctions lists?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.12	Does our company offer correspondent banking arrangements to shell banks? If No , are controls in place to identify shell banks and prevent correspondent banking services from being offered?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

5.13	Do we perform business with "Senior Political Figures" or "Politically Exposed Persons" their families or close contacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.14	Does our company apply enhanced due diligence measure to higher risk customers, including "Politically Exposed Persons"?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.15	Does our company have dealings with investors who appear on sanctions lists?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No, as regards prohibited activities
5.16	Do we distribute funds in any of the countries embargoed/sanctioned by OFAC or the EU or deemed deficient from an AML/CTF perspective by FATF?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5.17	Does our company obtain and verify identification information on its end clients, such as name, address, nationality/jurisdiction of incorporation, date of birth, government issued identification number? If Yes , where applicable, do we identify and verify the beneficial owners of our clients?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.18	Does our company collect relevant information in respect of the purpose and intended nature of the business relationship with our clients?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.19	Do we, on an ongoing basis, review our end clients to ensure that customer due diligence information and documentation regarding the end client is current and valid. If Yes , generally how often does this occur?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Other, depending on the risk rating
5.20	Do we perform ongoing monitoring of our clients and scrutiny of transactions, undertaken throughout the course of the business relationship, to ensure that the conducted transactions are consistent with our knowledge of the client/ the business and risk profile in question (including, where necessary, the origin of funds and origin of wealth)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5.21	Does our company purge or destroy customer records for closed accounts as directed under local law? If Yes , generally how often does this occur?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Deletion depends on the individual case
5.22	Are our company's policies and procedures compliant with the latest applicable Anti Bribery, Corruption (e.g. the Foreign Corrupt Practices Act), and Fraud laws and regulations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

6	Risk Management & Internal Controls	
6.1	Applicable policies in our company:	<input checked="" type="checkbox"/> Code of Ethics / Behaviour / Conduct (incl. insider dealing and personal transactions) <input checked="" type="checkbox"/> Anti-Bribery & Corruption <input checked="" type="checkbox"/> Conflicts of Interest (incl. inducements and market abuse) <input checked="" type="checkbox"/> Whistleblowing <input checked="" type="checkbox"/> Data Protection & Confidentiality <input checked="" type="checkbox"/> Business Continuity <input checked="" type="checkbox"/> Customer Complaints
6.2	Do we carry liability insurance for our company (Board of Directors and Executive Management)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

6.3	Do we confirm that we have an adequate and formal escalation process to inform you about any material breach and/or changes in relation to our regulatory status?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6.4	Do we confirm that we have an adequate and formal escalation process, reporting and documentation of incidents within our business operations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6.5	Do we screen new employees for financial crime sanctions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6.6	Name of our independent auditors: Materials findings and/or exceptions in the last external audit report of our company:	Deloitte GmbH Wirtschaftsprüfungsgesellschaft is Fondsdepot Bank GmbH external auditor and is responsible for the annual audit of its financial statements and accounting practices. The results of our external audits are for internal management use only and are not to be disclosed externally. There are no material findings and exceptions in our last external audit report. The results are published on "Elektronischer Bundesanzeiger" (www.bundesanzeiger.de) / exact search term: Fondsdepot Bank GmbH
6.7	Do we work with SSAE16 / ISAE3402 or similar audit reporting standards on internal controls?	<input type="checkbox"/> Yes, Type 1 describing systems and controls <input type="checkbox"/> Yes, Type 2 evaluating effectiveness of systems and Controls <input checked="" type="checkbox"/> No
6.8	Do we have an internal audit function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, outsourced <input type="checkbox"/> No
6.9	Do we have a compliance function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, outsourced <input type="checkbox"/> No
6.10	Do we have a risk management function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes, outsourced <input type="checkbox"/> No
6.11	Have our regular compliance monitoring, internal audit or risk management reviews led to any material findings in the last 3 years? Additional information:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The results of our compliance monitoring, internal audit or risk management are for internal management use and are not disclosed externally.
6.12	Have we been sanctioned in the last 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6.13	Have we been subject to legal investigation, fine or litigation in the last 3 years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6.14	Description of the measures taken by our company in order to maintain security, confidentiality and integrity of our data, prevention of data loss, or (if applicable) manipulation of data by unauthorized persons/parties.	We assure having a Data Protection Framework in place. Additionally, we work with separate risk management guidelines and internal policies, governing information security, information governance, business continuity management, third party service provider oversight, etc.



For more information:
www.fondsdepotbank.de