

**the
Wolfsberg
Group**

Financial Institution Name:
Location (Country):

Sparkasse Westmünsterland
Germany

No. #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Sparkasse Westmünsterland
2	Append a list of foreign branches which are covered by this questionnaire	Only branches in Nordrhein-Westfalen - For further information please visit: https://www.sparkasse-westmuensterland.de/home/service/finanzdienstleistungen
3	Full Legal (Registered) Address	Bahnhofstraße 1, 48693 Ahaus, Germany Overbergplatz 1, 48249 Dülmen, Germany
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	01.03.2003 by merger of KreisSparkasse Borken and Sparkasse Coesfeld
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 symbol	
6 b	Member-Owned/Mutual	No
6 c	Control or State Owned by 25% or more	No
6 d	Control by a Government	No
6 d1	If "Y", provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	Zero %, 0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If "Y", provide the name of the relevant branches which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	Bundesanstalt für Finanzdienstleistungsaufsicht
11	Provide Legal Entity Identifier (LEI) if available	529800JCAE554Q UY E1 40
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDD)	/.
13	Jurisdiction of licensing authority and regulator of ultimate parent	/.
14	Select the business areas applicable to the Entity	Yes
14 a	Retail Banking	

14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Asset Management Bank	No
14 j	Other (please explain)	Yes
14 k	Other (please explain)	/.
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided. If "Y", provide the top five countries where the non-resident customers are located)	/.
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If "N", clarify which questions the differences relate to and the branches that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	/.
2. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If "Y"	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to provide correspondent banking services to non-domestic banks?	
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships with foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Providers (PSPs)?	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	

19 a11	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MISPs/PSIs?	No
19 b	Cross-Border Bulk Cash Delivery	Yes
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hard Mail Bulk Cash Letters	No
19 f	Low Price Securities	No
19 g	Payable Through Accounts	No
19 h	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	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Robo-Advisors, Cashless (RDC)	No
19 l	Securitized Private AUMs	No
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the services to walk-in customers and if so, the applicable check cashing service	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Send or receive any instructions to or from a third party	No
19 p4a	If yes, state any instructions to or from a third party	
19 p4b	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)	No
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 differences relate to and the branches that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	/

22 m	Suspicious Activity Reporting	Yes
22 n	Transaction Monitoring	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	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 reporting on the status of the AML, CTF, & Sanctions programmes?	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programmes?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF, & Sanctions programme? If Y, provide further details	Yes
26 a	The AML /TF Officer and examinations of employees and third parties are located in geographical areas that comply with the regulations relating to AML, TF and Sanctions programme.	
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 differences relate to and the branches that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	/
4. ANTI BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures 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 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 the payment is 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 reporting on the status of the 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?	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
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or indirectly	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, friendships, charitable donations and political contributions	Yes

40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover A/C Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	Yes
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities are outsourced	Yes
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
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 42 and 43 are accurate and complete. If 'N', clarify which questions the differences relate to and the branches that this applies to.	Yes
44 a		
45	If appropriate, provide any additional information/context to the answers in this section.	J.
[E. AML, CTF & SANCTIONS POLICIES & PROCEDURES]		
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Sanctions violations	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. laws	No
48 b	U.K. laws	No
48 c	EU Standards	Yes
48 d	If 'Y', does the Entity retain a record of the results?	Yes
48 e	Does the Entity have policies and procedures that:	
48 f	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
48 g	Prohibit the opening and keeping of accounts for services to unlicensed banks	Yes
48 h	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
48 i	Prohibit accounts/relationships with shell banks	Yes
48 j	Prohibit dealing with another entity that provides services to shell banks	Yes
48 k	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
48 l	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
48 m	Prohibit opening and keeping of accounts for domestic and foreign PEPs, including their family and close associates	Yes

48 l	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by customers	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 l	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News "watchlists"	Yes
49 n	Outline the processes for the maintenance of internal document which defines a risk boundary around their business	Yes
50	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51	If 'Y', what is the retention period?	5 years or more
51 a		
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If 'N', clarify which questions the differences relate to and the branches that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	J.
[E. AML, CTF & SANCTIONS RISK ASSESSMENT]		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls elements detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If 'N', provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Transaction Monitoring	Yes
58 c	List Management	Yes
58 d	Management Information	Yes

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 59 are true and correct.	Yes
60 a	If N, clarify which questions the differences relate to and the branches that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	/
7. KYC, CDD 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	When onboarding, does the Entity gather and retain information on the following? 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:	Yes
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	Beneficial owners	Yes
66	When 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	Country of origin	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)	PEP-status
68	For high risk non-individual customers, is a site visit a part of the due diligence process?	Yes
68 a	If Y, is this process?	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

68 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating. (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 - 2 years	Yes
74 a3	3 - 4 years	No
74 a4	5 years or more	No
74 a5	Hyper-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	Do not have this category of customer or industry
76 b	Responsible Banks	Do not have this category of customer or industry
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	Do not have this category of customer or industry
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Government entities	Do not have this category of customer or industry
76 f	General Ledger Companies	Do not have this category of customer or industry
76 g	Mutuals-related Entities	Prohibited
76 h	MSB/MATS customers	Do not have this category of customer or industry
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
76 l	Nuclear power	Do not have this category of customer or industry
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	Do not have this category of customer or industry
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
76 s	Regulated changes	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Unincorporated entities	EDD on risk-based approach
76 v	Unrelated changes	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
Please note, that we are compliant with the AML act. This includes, among other things, that it's prohibited by our FCC programme to enter or maintain business connections with third parties, who do not comply with relevant laws or being illegal in any way.		
77	If restricted, provide details of the restriction	Every illegal transaction is strictly prohibited. Such a business relationship must be rejected and must be reported to the AML officer.
78	Does EDD require senior business management and/or compliance approval?	Yes

78 a	If Y, indicate who provides the approval: Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Compliance	
79	Does the Entity perform an additional control or quality check on all responses provided in the above Section 81?	Yes	
80	Confirm that all responses provided in the above Section 81 are representative of all the LE's branches.	Yes	
81 a	If N, clarify which questions the differences relate to and the branches that this applies to	Yes	
82	If appropriate, provide any additional information/context to the answers in this section.	We refer to our answers in 76 y and 77	
8. MONITORING & REPORTING			
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
84	Are transactions for suspicious activity monitored by the Entity to monitor transactions for suspicious activity?	Combination of automated and manual	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Automated software is filtering out cases. An Employee is working on the filtered cases.	
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?	Siron AML	
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 activity?	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 suspicious transactions and activity?	Yes	
87	Does the Entity have a program to review and escalate matters arising from the monitoring of suspicious transactions and activity?	Yes	
88	Does the Entity have processes in place to respond to Requests 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 81 are representative of all the LE's branches.	Yes	
90 a	If N, clarify which questions the differences relate to and the branches that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.	/	
9. PAYMENT TRANSPARENCY			
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with FATF Recommendation 16 Local Regulations?	Yes	
93 b	If Y, specify the regulation	Yes	
93 c	If N, explain	German AML law / Geldwäschegesetz (GWG), Kreditwesengesetz (KWG), EU-Regulations	
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	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 95 are representative of all the LE's branches.	Yes	
96 a	If N, clarify which questions the differences relate to and the branches that this applies to		
97	If appropriate, provide any additional information/context to the answers in this section.	/	
10. SANCTIONS			
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's accounts or services 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 screening?	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 or 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?	OS-Plus from Finanz-Informalik	
102 a2	When did you last test the effectiveness of (red flags plus 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, obtained in cross border transactions against Sanctions Lists?	Yes	
104	What is the method used by the Entity?	Automated	
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 business conducted with, or through accounts held at, foreign financial institutions.		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Not used	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Not used	
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Not used	

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lies maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
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/automat.	/
107 a	Transaction	Within 3 to 5 business days
107 b	Transaction	Within 3 to 5 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 LEA branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	/
110	If appropriate, provide any additional information/context to the answers in this section.	/
11. TRAINING & EDUCATION		
111	Does the Entity provide mandatory training, which includes:	Yes
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 internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 c	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 d	Product and Culture	Yes
111 e	Is the above mandatory training provided to:	Yes
111 f	Board and Senior Committee Management	Yes
112 a	1st Line of Defence	Yes
112 b	2nd Line of Defence	Yes
112 c	3rd Line of Defence	Yes
112 d	Third parties to which specific FCC activities have been	Not Applicable
112 e	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	CTF, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LEA branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	/
116	If appropriate, provide any additional information/context to the answers in this section.	/
12. QUALITY ASSURANCE COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance program for the above Section (separate from the Independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the Independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LEA branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branches 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 AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	Yearly
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	Yes
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Supervisory/Regulatory & Management Information	Yes
123 g	Sanctions Screening	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	/
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and effectiveness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LEA branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branches that this applies to.	/
126	If appropriate, provide any additional information/context to the answers in this section.	/
14. FRAUD		
127	Does the Entity have policies in place addressing fraud prevention & detecting fraud?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

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 accurate and complete.	Yes
131 a	If "No", clarify which questions the difference/s relate to and the branches that it/s applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crime Compliance OR equivalent)

Sparisase Westmünsterland (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 its accurate supplemental information on a timely basis.

I, Dr. Burkhard Westmünsterland (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 belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Fabian Dany [Signature] (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.

17.07.2023 (Signature & Date) 12.07.2023 (Signature & Date)

