

## AML Statement

### Anti-Money Laundering (AML) / Know Your Customer (KYC) Acknowledgement and Global Certification Regarding Foreign Correspondents Relationships (COLSDE33)

For information concerning the exchange of general information and corporate and regulatory disclosures please contact Mr. Sebastian Tusche (e-mail: [sebastian.tusche@sparkasse-koelnbonn.de](mailto:sebastian.tusche@sparkasse-koelnbonn.de))

For information concerning AML / KYC please contact Mr. Ernst Wiesel (e-mail: [ernst.wiesel@sparkasse-koelnbonn.de](mailto:ernst.wiesel@sparkasse-koelnbonn.de))

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|--|---|
| <b>Name</b>  | Sparkasse KölnBonn  |
| <b>Founded in</b>  | Köln (Cologne)<br>Germany<br>On 01/01/2005<br>(Stadtsparkasse Köln (est 1826) and Sparkasse Bonn (est 1844) merged to form the above)   |
| <b>Registered Office</b>   | Hahnenstr. 57<br>50667 Köln<br>Germany  |
| <b>Business Area</b>   | The cities of Cologne and Bonn  |
| <b>Legal from</b>  | Incorporated Public Law Institution   |
| <b>Is the bank publicly listed on a stock exchange?</b>              | no  |
| <b>Beneficial Owner(s)</b>   | No shares, private or government ownership. The "Zweckverband Sparkasse KölnBonn" is the special purpose association of Sparkasse KölnBonn (100 %) for which the responsible bodies are the cities of Cologne (70 %) and Bonn (30 %).                                   |
| <b>Management Board</b>  | Chairman and CEO: Artur Grzesiek<br>Management Board Members:<br>Dr. Nicole Handschuer, Dr. Christoph Siemons, Ulrich Voigt<br>Deputy Members of the Board:<br>Volker Schramm, Rainer Virnich<br>Chief Representative:<br>Christiane Weigand<br>all are german citizens |
| <b>Chairman of the Supervisory Board</b>                             | Martin Börschel   |
| <b>Our principal business activities and services are as follows</b> | Savings bank, universal and regional bank, corporate and private customers; mortgage lending, retail banking  |

**Bank code** 370 501 98

**SWIFT Address** COLSDE33

### Regulatory Authority

Our Bank is subject of the supervision of any regulatory authority.

#### Name of Regulator:

Bundesanstalt für Finanzdienstleistungsaufsicht ([www.BaFin.de](http://www.BaFin.de))  
Graurheindorfer Str. 108  
53117 Bonn  
Germany

BaFin Reg No. 100872

and

Europäische Zentralbank  
Sonnemannstraße 20  
60314 Frankfurt a.M.  
Germany  
[www.ecb-europe.eu](http://www.ecb-europe.eu)

### Key operating Figures (e.g. number of employees etc.)

#### Applicable Laws

Is the bank subject to laws and regulations for the prevention of money laundering and the financing of terrorists? Yes

Relevant laws and regulations:  
EU regulations and directives

Geldwäschegesetz (GWG) [Money Laundering Prevention Law]

Kreditwesengesetz (KWG) [Banking Law]

Außenwirtschaftsgesetz (AWG) [Foreign Trade & Payments Law]

Wertpapierhandelsgesetz (WPHG) [Securities Trading Law]

Amtliche Verlautbarungen des BaFin [Official statements of BaFin]

Sparkassengesetz NRW (SpkG NRW) [North Rhine-Westphalia Savings Banks Law]

#### AML policy an practice

Does our institution have a written policy against money laundering and terrorist financing? Yes

Does this policy meet FATF standards? Yes

Is the policy applicable to the headquarters, all branches and subsidiaries, including foreign branches and offices? Yes

We verify the customer's true identity with the help of reliable, independent documentary, data and information sources and we retain all relevant documents and information relating to the customer's identity and transactions in accordance with the requirements of the regulatory authority. Furthermore Sparkasse KölnBonn does not have any foreign branches and offices.

Does Sparkasse KölnBonn have any foreign branches and offices? No

Does our bank have an independent audit and/or compliance review function to test the adequacy of policy and procedures? Yes

Did our institute guidelines regarding relationships with politically active persons? Yes

### Operational area

Does our bank maintain a correspondent banking relationship to a shell bank or do business with a shell bank (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group)? No

Does our institution have a policy prohibiting correspondent accounts/ relationships with shell banks? Yes

Does our institution have policies to reasonably ensure that we will not conduct transactions with or on behalf of shell banks through any of our accounts or products? Yes

Does our institution have policies to reasonably ensure that it only operates with correspondent banks that possess licences to operate in their countries of origin? Yes

Does our institution obtain sufficient information to gain an understanding of our correspondents' business, reputation and regulatory history? Yes

Are all new correspondent relationships approved by a Senior Manager? Yes

Does our bank offer "Payable Through Accounts" or any other accounts which can transact through nostro and vostro accounts? (Payable Through Accounts are a type of correspondent banking account which is subdivided by the foreign bank into sub-accounts, each in the name of one of the foreign bank's customers, thus giving foreign bank's customers direct access to the products of the first financial institution.) No

Does our bank maintain anonymous accounts, or numbered accounts for which we do not collect the full details of the beneficial owner? No

Does our bank monitor customer account databases for terrorist names? Yes

Does our institution require full details for outgoing wire transactions, i.e. sender and beneficiary names, address and account number in accordance with the requirements of the regulatory authority? Yes

Does our institution have any restrictions under our Banking Licence e.g. is our institution only limited to conducting business with non-residents or in non-local currencies? No

Do we ensure that every customer who has maintained an account at our institution can be identified for a period of at least five years after their accounts were closed? Yes

Does our institution identify the economic owners of corporate enterprises ? Yes

## Risk management details

Has a compliance office been set up and is a compliance officer in charge of supervising and coordinating efforts against money laundering and terrorist financing as well as monitoring compliance? Yes

Contact address:

Sparkasse KölnBonn  
Geldwäschebeauftragter/ AML Officer  
Hahnenstr. 57  
50667 Köln  
Germany

Does our institution determine the appropriate level of enhanced and ongoing due diligence necessary for those categories of customers and transactions that we have reason to believe pose a heightened risk of money laundering and terrorist financing activities at or through our institution? Yes

Does our institution take steps to understand the normal and expected transactions of our customers based on our risk assessment of our customers? Yes

Has our institution implemented systems for the identification of all our customers at account opening, including verification of customer information from independent and reliable sources (e.g. name, street address, date of birth, number and type of valid official identification)? Yes

Does our institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening? Yes

## AML Training

Does our institution provide AML training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving our products and services and internal policies to prevent money laundering? Yes

Does our institution retain records of our training sessions including attendance records and relevant training materials used? Yes

Does our institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees? Yes

Does our institution employ agents to carry out some of the functions of our institutions and if so does our institution provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms money laundering involving our institution's products and services and internal policies to prevent money laundering? Yes

## Transaction monitoring

Does our institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers cheques, money orders, etc)? Yes

Does our institution filter payments against relevant sanctions lists? Yes

## Reportable transactions and prevention and detection of transactions with illegally obtained funds

Does our institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? Yes

Does our institution have procedures to identify transactions structured to avoid large cash reporting requirements? Yes

Does our institution screen transactions for customers or transactions we deem to be of significantly heightened risk (which may include persons, entities or countries that are contained on lists issued by government/ international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions? Yes

## Compliance status

Does our bank respect the currently valid laws and internal guidelines for the prevention of money laundering and the financing of terrorists? Yes

Has our institution been involved in any regulatory or criminal enforcement actions resulting from violations of laws or regulations against money laundering and terrorist financing in the past 5 years? No

Cologne, 06. October 2016