## the Wolfsberg Group

Financial Institution Name: Location (Country):

Rise Sparekasse	
Denmark	

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.

	rent than its Entity Head Office, a separate questionnaire can be completed	
No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	Rise Sparekasse
2	Append a list of foreign branches which are covered by this questionnaire	Rise Sparekasse
3	Full Legal (Registered) Address	St. Rise Landevej 10, 5970 Ærøskøbing
4	Full Primary Business Address (if different from above)	Same as above
5	Date of Entity incorporation/establishment	08.03.1860
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	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more  % of the Entity's total shares composed of bearer shares	
		0%
8	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	yes
10	Name of primary financial regulator/supervisory authority	Finanstilsynet (Danish Financial Supervisory Authority)
11	Provide Legal Entity Identifier (LEI) if available	213800MLL4APN9UP1J53
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
	*	

14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f		
	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
00.00		
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)	No
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
	Select the closest value:	. 50
16 a	Number of employees	1-50
16 b	Total Assets	Between \$100 and \$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 difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
a BRODI	ICTO A CERVACEO	
	ICTS & 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 downstream relationships?	
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)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No No
19 a1h3	PSPs	
12123103	rors	No

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	Yes
	/MVTSs/PSPs?	
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
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
191	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
40:4	KV -lance palent all that and balance	
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	
19 k	Remote Deposit Capture (RDC)	
191	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
19 0	Virtual Assets	
19 p	For each of the following please state whether you offer	
19 p	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	
	Wire transfers	No
19 p2		
19 p2a	If yes, state the applicable level of due diligence	V
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification and Verification
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
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.	We have no PSP customers (19a1h3).
3. AML, C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
		Yes
22 e	CDD	
22 f	EDD	Yes
		Yes
22 g	Independent Testing	
22 g 22 h	Periodic Review	Yes
22 g		
22 g 22 h	Periodic Review	Yes
22 g 22 h 22 i 22 j	Periodic Review Policies and Procedures	Yes Yes
22 g 22 h 22 i	Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	1-10
	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	Yes
	Management Committee? If N, describe your practice in	
OF	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
26	programme?  Does the Entity use third parties to carry out any	
20	components of its AML, CTF & Sanctions programme?	Yes
		- C-C-C-C-C-C-C-C-C-C-C-C-C-C-C-C-C-C-C
26 a	If Y, provide further details	The saving banks data center, SDC, procides a system for daily monitoring of transactions, and provides control
		against terrorists ans sanctions lists, but the savings bank itself set rules end processes the daily alarms from the
		system.
		aystan.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	V
	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.	
	and district of it this decitors.	
	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	No
	requirements to reasonably prevent, detect and report	No
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	No
	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	L.
	with sufficient experience/expertise responsible for	No
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels	
	of experience/expertise to implement the ABC	Yes
34	programme?	No. Control of
35	Is the Entity's ABC programme applicable to:  Does the Entity have a global ABC policy that:	Not Applicable
35 a	Prohibits the giving and receiving of bribes? This	
35 a	includes promising, offering, giving, solicitation or	
		No
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	
	with public officials?	No
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)?	No
	, , , , , , , , , , , , , , , , , , , ,	
	Days the Fatitute and a second of the second	
36	Does the Entity have controls in place to monitor the	No
37	effectiveness of their ABC programme?	
ગ	Does the Board receive, assess, and challenge regular	No
	reporting on the status of the ABC programme?	
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	No
	assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below	
40 a	Potential liability created by intermediaries and other third-	No
	party providers as appropriate	NO .
40 b	Corruption risks associated with the countries and	
		No
	through intermediaries	
40 c	Transactions, products or services, including those that	
		No
	officials	
40 d	Corruption risks associated with gifts and hospitality,	
		No
	contributions	

40 e	Changes in business activities that may materially	No
	increase the Entity's corruption risk	lac.
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	No
42 b	1st Line of Defence	No
42 c	2nd Line of Defence	No
42 d	3rd Line of Defence	No
42 e	Third parties to which specific compliance activities	
420	subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate	
721	(contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to	
45	specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section	
44		Yes
	are representative of all the LE's branches	2595
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	The is no legal requirement in Denmark for banks to adopt an ABC Policy. Bribery and corruption is coverede under Dansih Criminal Law. All staff are regularly made aware of their obligations and Sparekassens supports a whitsleblower Portal.
5. AML, C	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
1984	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect	
	and report	
46 a	Money laundering	Yes
46 b	Terrorist financing	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. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and	
a	fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for	Yes
40	unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d		Voc
	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money	Yes
49 h	transfer agents  Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Voc

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for terminating	es:
	existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime	
40 K	reasons that applies across the entity, including foreign	Yes
	A CONTRACTOR OF THE CONTRACTOR	Tes
	branches and affiliates	
49 I	Define the process and controls to identify and handle	
	customers that were previously exited for financial crime	Vac
	reasons if they seek to re-establish a relationship	Yes
	Todosila il dioy dodicto lo dollabilo il a relatione il	
49 m	Outline the processes regarding screening for sanctions,	
49 111		Yes
	PEPs and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal	
45 11	"watchlists"	No
50	Has the Entity defined a risk tolerance statement or similar	
	document which defines a risk boundary around their	Yes
	business?	
51	Does the Entity have record retention procedures that	
	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
Jia	ii i, what is the retention period?	
		E veers or more
		5 years or more
- 12		
52	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	I Va
52 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
	the prancines that this applies to.	
53	If appropriate, provide any additional information/context to	hand to the transfer of the control
53	If appropriate, provide any additional information/context to the answers in this section.	With respect to 48a and 48b we do not literally do a gap analysis against EU or US standards. Danish law
53		With respect to 48a and 48b we do not literally do a gap analysis against EU or US standards. Danish law corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US
53		
53		corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US
	the answers in this section.	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US
6. AML, C	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US
	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US
6. AML, C	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.
6. AML, C	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US
6. AML, C 54 54 a	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes
6. AML, C 54 54 a 54 b	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes
6. AML, C 54 54 a 54 b 54 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes
6. AML, C 54 54 a 54 b 54 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	the answers in this section.  IF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 a 55 b	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 a	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 64 a 54 b 54 c 54 d 55 55 55 c 55 d 55 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 d 55 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 d 55 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 55 d 55 a 55 a 55 c 55 d 55 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54  54 a 54 b 54 c 54 d 55 a 55 a 55 c 55 d 55 e  55 f 55 g	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 55 c 55 a 55 c 55 c 55 c 55 d 55 c 55 d 55 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News  Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 55 c 55 a 55 c 55 c 55 c 55 d 55 c 55 d 55 c	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
6. AML, C 54 54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence  PEP Identification  Transaction Screening  Name Screening against Adverse Media/Negative News  Training and Education  Governance  Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
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6. AML, C 54  54 a 54 b 54 c 54 c 55 c 55 d 55 c 55 d 55 e 55 f 56 a 57 a 57 a	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News  Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
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6. AML, C 54  54 a 54 b 54 c 55 c 55 d 55 c 55 d 55 c 55 d 55 e  55 f 55 g 55 h 56 a	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News  Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
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6. AML, C 54 54 a 54 b 55 c 55 c 55 c 55 c 55 c 55 f 55 c 55 f 55 c 55 f 55 g 55 h 56 56 a 57 c 57 a 57 d 58 a 58 b	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
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6. AML, C 54 54 a 54 b 55 c 55 c 55 c 55 c 55 c 55 f 55 c 55 f 55 c 55 f 55 g 55 h 56 56 a 57 c 57 a 57 d 58 a 58 b	the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	corresponds to EU law as a minimum concerning AML, CTF and Sanctions, and we also do monitor against US sanction lists.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

	T 20120001200000000000000000000000000000	
58 e	Name Screening	No
58 f	Transaction Screening	No
58 g	Training and Education	No
59	Has the Entity's Sanctions EWRA been completed in the	
••		No l
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	was completed.	We have no experience EVADA
		We have no sanctions EWRA.
60	One for that all accounts and ideal in the above One fire	
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to and	
00 u		
	the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to	
	the answers in this section.	
4		
7 KYC CI	DD and EDD	
		N
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD	
12760		Vec
	must be completed, e.g. at the time of onboarding or within	100
	30 days?	
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		Yes
	Expected activity	
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
		105
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied to	
00		25%
	beneficial ownership identification?	
67	Does the due diligence process result in customers	
		Yes
	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
07 -4		Voc
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)	
		PEP and relatede to PEP; number of years the customer relationsship has lasted; type of transactions; has the
		customer been physically present etc.
		New A state of the Contract of
68	For high risk non-individual customers, is a site visit a part	V
	of your KYC process?	Yes
40		
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
		****
68 a2	KYC renewal	
68 a3	Trigger event	Yes
68 a4	Other	
68 a4a	If yes, please specify "Other"	
	. ,,,	l I
		l l
		,
00	Description of the second seco	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
	The state of the s	AUTOD
	4	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
		Yes
69 a2	KYC renewal	l es

- 20		
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Manual
474	Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening	
••	customers and connected parties to determine whether	
		Yes
	they are PEPs, or controlled by PEPs?	
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?	
12	What is the method used by the Entity to solden PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes	
,,,	to review and escalate potential matches from screening	
		Yes
	customers and connected parties to determine whether	i es
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	163
74 a	If yes, select all that apply:	
74 a1	Less than one year	
		Yes
74 a2	1 – 2 years	
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
, ,	outs. (i react spoons)	
75	Does the Entity maintain and report metrics on current and	
15	100	lv
	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	Respondent 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?	
70	Embassies/Consulates	Do not have this patence of austomar or industry
		Do not have this category of customer or industry
76 c		
76 d	Extractive industries	Do not have this category of customer or industry
		Always subject to EDD
76 d 76 e	Extractive industries Gambling customers	
76 d 76 e 76 f	Extractive industries Gambling customers General Trading Companies	Always subject to EDD EDD on risk-based approach
76 d 76 e 76 f 76 g	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h 76 i	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	Atways subject to EDD EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h 76 i	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers	Atways subject to EDD EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Always subject to EDD EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Always subject to EDD Do not have this category of customer or industry Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h 76 j 76 k 76 j 76 k 76 l	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Do not have this category of customer or industry  Always subject to EDD  Always subject to EDD
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Always subject to EDD  Always subject to EDD
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Always subject to EDD  Always subject to EDD
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Always subject to EDD
76 d 76 e 76 f 76 g 76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 q	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  EDD on thave this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Always subject to EDD  Always subject to EDD  Always subject to EDD  Do not have this category of customer or industry
76 d 76 e 76 f 76 g 76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s	Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Always subject to EDD  EDD on risk-based approach  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  EDD on thave this category of customer or industry  Always subject to EDD  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Always subject to EDD  Always subject to EDD  Always subject to EDD  Do not have this category of customer or industry  Do not have this category of customer or industry
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80 Does the Entity perform additional control or quality review or cluder's subject to EDD?  81 Confirm that of responses provide in the adove Section (Page 1) and the provide any additional information/context to the amount of the amount o	79	Does the Entity have specific procedures for onboarding	
accountants, consultants, real-estate operator or quality review on clearly accident an additional control or quality review on clearly subject to EED?  18 Confirm that all responses provided in the above Section (%)  18 A Fin. Catify which quantions the difference relate to and the branches that this applies to the surprise of the provided in the above Section (%)  18 A Septembria, provide any additional information/context to the arrevers in this section.  18 A Monitorian & REPORTING  19 A What is the mention used by the Entity to monitor (%)  18 A What is the mention used by the Entity to monitor (%)  18 A What is the mention used by the Entity to monitor (%)  18 A Final and or combination selected, specify what type of transactions are monitored manually and automated and manually (%)  18 A Ladornated or combination selected, are reternal systems or combination selected and systems or combination select		entities that handle client money such as lawyers.	No.
90 Oces the Entity perform an additional control or quality newwo on cleans subject to EDD? 91 Confirm that all responses provided in the above Section are representative of all the LEX branches that the applies to the branches that the applies to and the branches that the applies to the answers in this section.  92 Fapprograte, provide any additional information/context to the answers in this section.  93 Oces the Entity have risk based policies, procedures and nontriving processes for the desinification and reporting of nontriving processes and security of transactions are nontriving activities?  94 a 1 Fautomitted or combination selected, specify what type of transactions are nontriving activities?  95 Ab 1 Fautomitted or combination selected, specify what type of transactions are nontriving activities and selected and any selected and activity?  96 Ab 2 When was the tool last updated?  97 Participation and the activities of the processes of the proc			
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81 a recesserative of all the LE branches are recesserative of all the LE branches by the the the LE branches by the answering in this section  By the the LE branches by the LE automated or the the derification and reporting of suspicious activities?  What is the method used by the Entity to monitor transactions for agreemant active the transactions active the transactions are mentioned menually the transactions of automated and manual transactions of automated and manual transactions are mentioned menually the transactions are mentioned menually the transactions are mentioned menually the transaction of automated and manual transactions are mentioned menually the transactions are mentioned menually the transactions are mentioned menually the transactions are mentioned as used?  By the automated or combination selected, are internel by the automated or an activity the activity t	80		Yes
are representative of all the LEP branches  1 a			
are excessfrative of all the LPS branches  1	81		Yes
## BY ADDITION OF THE PROPERTY			
## appropriate, provide any additional information/context to the answers in this section.  ### ## ## ### ### ### ### ### ### ###	81 a		
B. MONITORING & REPORTING		the branch/es that this applies to	
B. MONTORING & REPORTING			
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8. MONITORING & REPORTING 8. BO Bit B Chilly have risk based policies, procedures and monitoring processes for the identification and reporting of supplications activities?  84 a What is the method used by the Entity to monitor transactions for supplicate activities?  84 a If manual or combination selected, specify what type of transactions are monitored manually  84 b If automated or combination selected, specify what type of transactions are monitored manually  84 b If automated or combination selected, are internal system or vendor-sourced tools used?  84 b If automated or combination selected, are internal system or vendor-sourced tool or Both selected, what is the rame of the vendor-sourced tool or Both selected, what is the rame of the vendor-sourced tool or Both selected, what is the rame of the vendor-sourced tool or Both selected, what is the rame of the vendor-sourced tool is used?  84 b I When was the tool last updated?  85 Does bit Entity have explicites, procedures and processes to review and escaled matters arising from the monitoring of usubmer transactions are subjects to transactions?  86 Does the Entity have a date quality management programment or expect speciates or processes in pice to review and escaled matters arising from the monitoring of submer transactions are subject to monitoring?  87 Does the Entity have a date quality management programment or expect speciates in pice to respond to Request for information (RFIs) form other entities on a report transactions are subject to monitoring?  88 Does the Entity have does the complete date for all transactions are subject to monitoring?  89 Does the Entity have does the ordinate and the branches relate to and the branches that this applies to the Mofisberg Group Payment to the propriets provide any additional information/context to the another in the supplies after the total to and the branches that this applies to the Mofisberg Group Payment transports.	82		
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Transparency Standards?	9. PAYME	ENT TRANSPARENCY	
	9. PAYME	ENT TRANSPARENCY  Does the Entity adhere to the Wolfsberg Group Payment	Yes

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	(EU) No. 2015/849 (4.th. AMLD), (EU) No. 2018/843 (5.th. AMLD), Regulation (EU) 2015/847, "Bekendtgørelse af lov om forebyggende foransalthringer mod hvidvask og finansiering af terrorisme" (Danish Act on Measures to Prevent Money Laudering and the Financing of Terrorism) Consolidated Act. No. 316 dated 11/03/2022.
93 с	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. SANCT	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)?	
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?	
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?	Automated
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?	Dow Jones list (via SDC A/S)
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)	Other
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
		Automated
104	What is the method used by the Entity?	
104 105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	Yes
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its sanctions screening processes:  Consolidated United Nations Security Council Sanctions	Yes  Used for screening customers and beneficial owners and for filtering transactional data
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its sanctions screening processes:	

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	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 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.	
THE RESIDENCE OF THE PARTY OF T	IING & 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	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	No
112 f	Non-employed workers (contractors/consultants)	No
	Does the Entity provide AML, CTF & Sanctions training	
113	that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
113	that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML, CTF	Yes Yes
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123 c   Governance   Yes     123 d   KYC/CDD/EDD and underlying methodologies   Yes     123 e   Name Screening & List Management   Yes     123 f   Reporting/Metrics & Management Information   Yes     123 i   Transaction Monitoring   Yes     123 i   Transaction Screening including for sanctions   Yes     123 k   Training & Education   Yes     123 l   Other (specify)	123 b		Yes
Name Screening & List Management   Yes			Yes
Reporting/Metrics & Management Information   Yes     123 g	123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 g   Suspicious Activity Filing   Yes     123 h   Technology   Yes     123 l   Transaction Monitoring   Yes     123 j   Transaction Screening including for sanctions   Yes     123 k   Training & Education   Yes     123 l   Other (specify)     124	123 e		Yes
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127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible for Yes	14. FRAU	D	
risk?  128 Does the Entity have a dedicated team responsible for Yes			Van
			103
preventing & detecting fraud?	128		Yes
	40.7	preventing & detecting fraud?	

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.	Fraud is usually detected and stopped by our data centre (SDC A/S), which is also able to finde additional information, as for example IP-adressen, device ID etc.

## 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 Crimes Compliance OR equivalent)

Rise Sparekasse 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 urisdictions in which it does business and holds accounts.

Sparekasse 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.

Rise Sparekasse recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

Rise Sparekasse 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

al yead 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 that I am authorised to execute this declaration on behalf of the Financial Institution. , Bjarne Valentin Nielsen (Global and correct to my honest belief,

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 . Vivian Beck (MLRO or eq

(Signature & Date)

(Signature & Date)

Bjarne V. Nielsen Sparekassedirektør Vivian Beck

Complianceansvarlig