the Wolfsberg Group

Financial Institution Name: Location (Country) :

Norddeutsche Landesbank Luxembourg S.A., Covered Bond Bank 7, rue Lou Hemmer, L-1748 Luxembourg-Findel

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

No #	nt than its Entity Head Office, a separate questionnaire can be completed	
	Question & OWNERSHIP	Answer
1. ENIII Y (& OWNERSHIP Full Legal Name	
•	i uii Legai Nairie	
		Norddeutsche Landesbank Luxembourg S.A., Covered Bond Bank
2	Append a list of foreign branches which are covered by	
_	this questionnaire	
		None
3	Full Legal (Registered) Address	
		7. ruo Lau Hammar I. 1749 Luvambaura Findal
		7, rue Lou Hemmer, L-1748 Luxembourg-Findel
4	Full Primary Business Address (if different from above)	
		not applicable
	D . (F .::	
5	Date of Entity incorporation/establishment	
		1972
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	not applicable
0.1	Marshau Own ad Mistral	NI-
6 b 6 c	Member Owned/Mutual Government or State Owned by 25% or more	No Yes
6 d	Privately Owned	No 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	
		none
8	Does the Entity, or any of its branches, operate under an	
J	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	no
10	services only through online channels? Name of primary financial regulator/supervisory authority	
10	inanie or primary imanoar regulator/supervisory authority	
		European Central Bank (ECB), Commission de Surveillance du Secteur Financier (CSSF)
11	Provide Legal Entity Identifier (LEI) if available	
-		
		CAF7KSNT1N0CTA93RI98
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	Norddoutecha Landachank, Cirozantrala
		Norddeutsche Landesbank - Girozentrale -
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	Germany, Bundesanstalt für Finanzdienstleistungsaufsicht (Bafin), Graurheindorfer Str. 108, D-53117 Bonn
		Doming, Danassandak tai Finanzaionokangaaaloioni (Dalin), Oraamoinatono ok. 100, D'00117 Dollii
14	Select the business areas applicable to the Entity	

	3	rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
14 a	Retail Banking	No
14 b		No
14 c	Commercial Banking	Yes
14 d		No
14 e		No
14 f		No
14 g	Ÿ	No
14 h		No
14 i		No
14 j		No
14 k	Other (please explain)	
	Constitution of the consti	Covered Bond, Loans, Financial Market & Sales, Client Services & B2B
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:	
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Greater trian \$500 million
	are representative of all the LE's branches.	No branches
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.	-
2. PRODU	CTS & 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		No .
19 a1h2		No .
19 a1h3	PSPs	No

19 a1i	Does the Entity have processes and procedures	
		No
		NO
	MSBs /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
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
10:1	If V. places coloct all that apply holow?	
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	
40.1	Drivata Bankina	NI-
<u>19 j</u>	Private Banking	No .
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
19 o	Virtual Assets	No
		110
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2		No
		110
19 p2a	If yes, state the applicable level of due diligence	
19 p3		No
19 p3a	If yes, state the applicable level of due diligence	
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	
19 þ3		
	please provide more detail here, including	none
	describing the level of due diligence.	none
	Other black of the medical and a section of the Official bands	
19 q	Other high-risk products and services identified by the	
	Entity (please specify)	
		none
20	Confirm that all responses provided in the above Section	
		No breakhan
	are representative of all the LE's branches	No branches
20.2	are representative of all the LE's branches.	No branches
20 a	If N, clarify which questions the difference/s relate to	No branches
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	No branches not applicable
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context	
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21	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	
21	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	
21 3. AML, CT	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	
21	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum	
21 3. AML, CT	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	
3. AML, CT	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	not applicable
3. AML, CT 22	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	not applicable - Yes
3. AML, CT	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	not applicable
21 3. AML, CT 22 22 a 22 b	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	not applicable - Yes Yes
21 3. AML, CT 22 22 a 22 b 22 c	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	not applicable - Yes Yes Yes
21 3. AML, CT 22 22 a 22 b 22 c 22 d	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	not applicable - Yes Yes Yes Yes Not Applicable
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	rot applicable - Yes Yes Yes Yes Not Applicable Yes
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	rot applicable
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	rot applicable - Yes Yes Yes Yes Not Applicable Yes
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	rot applicable
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	rot applicable - Yes
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	rot applicable
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	rot applicable
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j 22 k	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	rot applicable
21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section.	rot applicable

22 m	Supplicious Activity Deporting	Voc
22 m 22 n	Suspicious Activity Reporting Training and Education	Yes Yes
22 II 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 Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	Due Diligence is executed by Nord/LB Girozentrale as ultimate parent
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
29	If appropriate, provide any additional information/context to the answers in this section.	Comment on question 22d: the entity does not handle cash
4. ANTI BF	RIBERY & 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	Yes
32	sets minimum ABC standards? Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for	Yes
33	coordinating the ABC programme? Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	-
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
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 through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes

	Wollsberg Group Co	prrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, 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 ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
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 subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Not Applicable
45	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
5. AML, C	TF & 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	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	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49 49 a	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts.	Yes
49 b	fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	
49 f	services to shell banks Prohibit opening and keeping of accounts for Section	Yes
	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 transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

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49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	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 I	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	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
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 difference/s relate to and the branch/es that this applies to.	Not Applicable
53	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
6. AML, CTI	F & 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 55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h 56	Management Information Has the Entity's AML & CTF EWRA been completed in	Yes Yes
56 a	the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	
	211141 Had completed.	-
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client Product	Yes
57 b 57 c	Channel	Yes Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls	
	effectiveness components detailed below:	Yes
58 a 58 b	effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes
58 a	effectiveness components detailed below: Customer Due Diligence	

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	
33 a		
	was completed.	
60	Confirm that all responses provided in the above Section	
00		Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		-
<u>C4</u>	If appropriate provide any additional information/contact	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7 KVC CE	DD and EDD	
		l Van
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	l
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 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	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	
	to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
07	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
01 a		
	customer's risk classification? Select all that apply:	L.
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)	
		-
68	For high risk non-individual customers, is a site visit a	No
	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
vo a4a	ii yes, piease specily. Other	
69	Does the Entity have a risk based approach to screening	
OB.		Yes.
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

	T	
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Manual
	Adverse Media/Negative News?	
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?	
74	If V is this - t	
71 a	If Y, is this at:	Vac
71 a1	Onboarding KYC repowel	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event What is the method used by the Entity to screen PEPs?	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
	Describe F. W. J	
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	lo KVC renewed at defined for	
74	Is KYC renewed at defined frequencies based on risk	Yes
74 a	rating (Periodic Reviews)? If yes, select all that apply:	
74 a 74 a1	If yes, select all that apply: Less than one year	No
74 a1 74 a2	Less than one year 1 – 2 years	No Yes
74 a2 74 a3	1 – 2 years 3 – 4 years	Yes Yes
74 a3 74 a4	5 years or more	Yes
74 a4 74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a5 74 a6	Other (Please specify)	
	1//	
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75	Does the Entity maintain and a	
75	Does the Entity maintain and report metrics on current	Vec
	and past periodic or trigger event due diligence reviews?	160
76	From the liet holow, which cote and its a	
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or	
	industries are subject to EDD and/or are restricted, or prohibited by the Entity's ECC programme?	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
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?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities MSB/MVTS customers	Prohibited Prohibited
76 h	MSB/MVTS customers Non-account customers	Prohibited Prohibited
76 i	Non-account customers Non-Government Organisations	Pronibited Restricted
<u>76 j</u> 76 k	Non-Government Organisations Non-resident customers	Restricted EDD on risk-based approach
76 k 76 l	Non-resident customers Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 m 76 n	PEPs Providers	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Close Associates PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Restricted
76 y	Other (specify)	
		l
		l ⁻
		l
77	If restricted, provide details of the restriction	
*	,,	Restricted means that such customer relationships are subject to prior approval by the Customer Acceptance
		Restricted means that such customer relationships are subject to prior approval by the Customer Acceptance Comitee
		1555
	· i	•
70	Door EDD require against the last	
78	Does EDD require senior business management and/or compliance approval?	Yes

70 -	I Whatestandananda d	Dut
78 a 79	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding	Both
79	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	-
82	If appropriate, provide any additional information/context to the answers in this section.	-
8. MONI	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual 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?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Siron by IMTF (former Fico Tonbeller)
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	-
91	If appropriate, provide any additional information/context to the answers in this section.	Question 84b2/b3: Ongoing review for any necessary adjustments of the circumstantial model to current requirements
9. PAYM	IENT 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:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Regulation (EU)2015/847 of the EP and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	-
10. SANCT	TIONS	
	Does the Entity have a Sanctions Policy approved by	
98	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	Market and the last
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?	Siron Embargo
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	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 sanctions screening processes:	
106 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data

	Wollaberg Group oc	rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	World Check (Thomson Reuters)
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
110	If appropriate, provide any additional information/context to the answers in this section.	-
11. TRAINII	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	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 ECC activities have	No
112 f	Non-employed workers (contractors/consultants)	No No
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	If Y, how frequently is training delivered?	Every Two Years
115	Confirm that all responses provided in the above Section	1

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17. QUALITY ASSURANCE (COMPLIANCE TESTING)	116		
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Internal Audit Department Yearly Yearly	122	How often is the Entity audited on its AML, CTF, ABC,	
122 b		Fraud and Sanctions programme by the following:	
Does the internal audit function or other independent third party cover the following areas: 123 a AML_CTF, ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment Yes 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies Yes 123 e Name Screening & List Management Yes 123 e Name Screening & List Management Yes 123 g Suspicious Activity Filing 123 h Technology Yes 123 1 Technology Yes 123 1 Transaction Monitoring Yes 123 1 Transaction Screening including for sanctions Yes 123 1 Transaction Monitoring 124 Are adverse findings from internal & external audit tracked to completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 126 If N, clarify which questions the difference's relate to and the branch/es that this applies to. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	122 a	Internal Audit Department	Yearly
third party cover the following areas: 123 a AML_CTF, ABC, Fraud and Sanctions policy and procedures AML_CTF, ABC, Fraud and Sanctions policy and procedures 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 Reporting/Metrics & Management Information Yes 123 g Suspicious Activity Filing Yes 123 h Technology Yes 123 h Tennaction Monitoring Yes 123 j Transaction Screening including for sanctions Yes 123 j Transaction Screening including for sanctions Yes 123 j Transaction Screening including for sanctions Yes 123 l Training & Education Yes 124 Are adverse findings from internal & external audit tracked to completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 126 If N, Clarify which questions the difference's relate to and the branch/es that this applies to. 127 Does the Entity have policies in place addressing fraud fisk? 128 Does the Entity have a dedicated team responsible for Ves 129 Does the Entity have a dedicated team responsible for Ves	122 b	External Third Party	Yearly
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Procedures Pes		third party cover the following areas:	
procedures Enterprise Wide Risk Assessment Pes Governance RYC/CDD/EDD and underlying methodologies Pes RYC/CDD/EDD and underlying methodologies Pes Reporting/Metrics & Management Pes Reporting/Metrics & Management Pes Reporting/Metrics & Management Information Pes Reporting/Metrics & Management Pes Reporting/Metrics & Reporting/Metrics Pes Reporting/Reporting/Metrics & Reporting/Metrics Pes Reporting/Rep Reporting/Reporting/Reporting/Reporting/Reporting/Reporting/Rep	123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Vec
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 g Suspicious Activity Filing Yes 123 h Technology Yes 123 l Transaction Monitoring Yes 123 l Transaction Screening including for sanctions Yes 123 l Transaction Screening including for sanctions Yes 123 l Transaction Screening including for sanctions Yes 123 l Other (specify)		procedures	Tes .
123 d KYC/CDD/EDD and underlying methodologies Yes	123 b	Enterprise Wide Risk Assessment	Yes
123 e		Governance	Yes
Reporting/Metrics & Management Information Yes	123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 g Suspicious Activity Filing 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)	123 e		Yes
Technology Yes		Reporting/Metrics & Management Information	Yes
Transaction Monitoring Yes	123 g	Suspicious Activity Filing	Yes
Transaction Screening including for sanctions Yes	123 h	Technology	Yes
123 k Training & Education Yes 123 l Other (specify)	123 i		
124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es 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 risk? 128 Does the Entity have a dedicated team responsible for	123 j		
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risk? 128 Does the Entity have a dedicated team responsible for Ves			
128 Does the Entity have a dedicated team responsible for Ves	12/		Yes
, i lyde	120		
Preventing α detecting fractor	126		Yes
		preventing a detecting fraud?	

129	Does the Entity have real time monitoring to detect fraud?	No
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?	
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
132	If appropriate, provide any additional information/context to the answers in this section.	-

Declaration Statement

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)

Nord/LB CBB is fully committed to the fight against financial crime and makes

every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

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

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, Jörn Hamann (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, Ingo Zentgraf (MLRO or equivalent), certify that I have read and understood this declaration	n, 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.	

that I am authorised to execute this declaration on behalf of	the Financial Institution.
	(Signature & Date)
	(Signature & Date)