




Financial Institution Name:

VerbundVolksbank OWL eG

Location (Country) :

Paderborn, Germany

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	VerbundVolksbank OWL eG
2	Append a list of branches which are covered by this questionnaire	all branches as shown on our website: <a href="https://www.verbundvolksbank-owl.de/service/filialfinder.html">https://www.verbundvolksbank-owl.de/service/filialfinder.html</a>
3	Full Legal (Registered) Address	Neuer Platz 1 , 33098 Paderborn, Germany
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	06.07.1897
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	Yes
6 c	Government or State Owned by 25% or more	no
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	We are a cooperative with more than 115,000 members. None of them holds more than 1 % of our shares
7	% of the Entity's total shares composed of bearer shares	none
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	no
a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), Bonn
10	Provide Legal Entity Identifier (LEI) if available	529900NYZV9N6UZ09F32

11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	no
13 f	Financial Markets Trading	no
13 g	Securities Services / Custody	no
13 h	Broker / Dealer	no
13 i	Multilateral Development Bank	no
13 j	Other	-
14	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where off-shore means not domiciled in the jurisdiction where bank services are being provided) ?	no
14 a	If Y, provide details of the country and %	
15	Select the closest value:	
15 a	Number of employees	501-1000
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	No
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	no
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	no
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	no
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	no
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	no
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	no
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	no
17 b	Private Banking (domestic & international)	Yes
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	no
17 e	Stored Value Instruments	Yes
17 f	Cross Border Bulk Cash Delivery	no
17 g	Domestic Bulk Cash Delivery	no
17 h	International Cash Letter	Yes
17 i	Remote Deposit Capture	no
17 j	Virtual /Digital Currencies	no
17 k	Low Price Securities	no
17 l	Hold Mail	no
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	none
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	We cooperate with our correspondent banks for our identified and monitored customers only. We do not use our correspondent banks on behalf of other banks or for walk-in customers/non-account holders.

<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>19</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>19 a</b>	Appointed Officer with sufficient experience/expertise	Yes
<b>19 b</b>	Cash Reporting	Not Applicable
<b>19 c</b>	CDD	Yes
<b>19 d</b>	EDD	Yes
<b>19 e</b>	Beneficial Ownership	Yes
<b>19 f</b>	Independent Testing	Yes
<b>19 g</b>	Periodic Review	Yes
<b>19 h</b>	Policies and Procedures	Yes
<b>19 i</b>	Risk Assessment	Yes
<b>19 j</b>	Sanctions	Yes
<b>19 k</b>	PEP Screening	Yes
<b>19 l</b>	Adverse Information Screening	Yes
<b>19 m</b>	Suspicious Activity Reporting	Yes
<b>19 n</b>	Training and Education	Yes
<b>19 o</b>	Transaction Monitoring	Yes
<b>20</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
<b>21</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
<b>22</b>	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Yes
<b>23</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
<b>23 a</b>	If Y, provide further details	In addition to our sanctions and adverse information screening we use DZ BANK AG for transaction screening.
<b>24</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
<b>24 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>24 b</b>	If appropriate, provide any additional information / context to the answers in this section.	19 b: there are no reporting obligations in Germany

4. ANTI BRIBERY & CORRUPTION		
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	No
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	No
29 b	Third parties acting on behalf of the Entity	No
30	Does the Entity have a global ABC policy that:	
30 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
30 b	Includes enhanced requirements regarding interaction with public officials?	No
30 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
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	No
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No

35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	No
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	No
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
37 f	Non-employed workers as appropriate (contractors/consultants)	No
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

5. POLICIES & PROCEDURES		
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	no
42 a1	If Y, does the Entity retain a record of the results?	
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 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	no
43 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

6. AML, CTF & SANCTIONS RISK ASSESSMENT		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	



7. KYC, CDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	fictitious beneficial owners
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	Yes
63 b	Manual	No
63 c	Combination of automated and manual	No
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	Yes
66 b	Manual	Yes
66 c	Combination of automated and manual	Yes
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

70	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?	
70 a	Non-account customers	Prohibited
70 b	Offshore customers	EDD & Restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	None of the above
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD & Restricted on a risk based approach
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD & Restricted on a risk based approach
70 j	Atomic power	EDD & Restricted on a risk based approach
70 k	Extractive industries	EDD on a risk based approach
70 l	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	EDD on a risk based approach
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	EDD on a risk based approach
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	EDD on a risk based approach
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	
71	If restricted, provide details of the restriction	Restricted by management and documented in onboarding processes, governance in compliance division
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	Unlicensed or illegal business is generally prohibited.

8. MONITORING & REPORTING		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	Yes
75 b	Manual	No
75 c	Combination of automated and manual	No
76	If manual or combination selected, specify what type of transactions are monitored manually	
77	Does the Entity have regulatory requirements to report currency transactions?	No
77 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
9. PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	german anti money laundering act ("Geldwäschegesetz"), german criminal code ("Strafgesetzbuch"), EU regulation 2015/847 on information accompanying transfers of funds ("EU-Geldtransferverordnung", former regulation EU 1781/2006)
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes

84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>10. SANCTIONS</b>		
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
87	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
88	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
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
90	What is the method used by the Entity?	
90 a	Manual	No
90 b	Automated	Yes
90 c	Combination of Automated and Manual	No
91	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
92	What is the method used by the Entity?	
92 a	Manual	No
92 b	Automated	Yes
92 c	Combination of Automated and Manual	No
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 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
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)

93 f	Other (specify)	
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and/or automated screening systems against:	
95 a	Customer Data	Same day to next day
95 b	Transactions	immediately to next day
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	No
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	No
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	No

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>13. AUDIT</b>		
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly

<b>108</b>	Does the internal audit function or other independent third party cover the following areas:	
<b>108 a</b>	AML, CTF & Sanctions policy and procedures	Yes
<b>108 b</b>	KYC / CDD / EDD and underlying methodologies	Yes
<b>108 c</b>	Transaction Monitoring	Yes
<b>108 d</b>	Transaction Screening including for sanctions	Yes
<b>108 e</b>	Name Screening & List Management	Yes
<b>108 f</b>	Training & Education	Yes
<b>108 g</b>	Technology	Yes
<b>108 h</b>	Governance	Yes
<b>108 i</b>	Reporting/Metrics & Management Information	Yes
<b>108 j</b>	Suspicious Activity Filing	Yes
<b>108 k</b>	Enterprise Wide Risk Assessment	Yes
<b>108 l</b>	Other (specify)	
<b>109</b>	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
<b>110</b>	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
<b>110 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>110 b</b>	If appropriate, provide any additional information / context to the answers in this section.	



**Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

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)

VerbundVolksbank OWL eG 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.

VerbundVolksbank OWL eG 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.

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

VerbundVolksbank OWL eG 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 on an annual basis.

VerbundVolksbank OWL eG commits to file accurate supplemental information on a timely basis.

I, Herbert Krüger (Head of International dept.), 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 VerbundVolksbank OWL eG.

I, Ingemar Hansmann (MLRO), 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 VerbundVolksbank OWL eG.

VerbundVolksbank OWL eG

12.04.19

(Signature & Date (DD/MM/YYYY) )

VerbundVolksbank OWL eG

12.04.19

(Signature & Date (DD/MM/YYYY) )