

CERTIFICATION REGARDING CORRESPONDENT ACCOUNTS

The undersigned financial institution, Kreissparkasse Köln, hereby certifies as follows:

A. This Certification applies to all accounts established for Kreissparkasse Köln covered by Financial institution's.

B. Physical Presence/Regulated Affiliate Status:

Kreissparkasse Köln maintains a physical presence in Germany. That means:

- Kreissparkasse Köln has a place of business at the following street address: Neumarkt 18-24, 50667 Köln, where Kreissparkasse Köln employs one or more individuals on a full-time basis and maintains operating records related to its banking activities.
- The above address is in Germany, where Kreissparkasse Köln is authorized to conduct banking activities.
- Kreissparkasse Köln is subject to inspection by Bundesanstalt für Finanzdienstleistungsaufsicht Graurheindorfer Str. 108, 53117 Bonn, the banking authority that licensed Foreign Bank to conduct banking activities

C. Indirect Use of Correspondent Accounts:

No Correspondent Account maintained by a Covered Financial Institution may be used to indirectly provide banking services to certain foreign banks. Kreissparkasse Köln hereby certifies that it does not use any Correspondent Account with a Covered Financial Institution to indirectly provide banking services to any foreign bank that does not maintain a physical presence in any country and that is not a regulated affiliate.

D. Ownership Information:

Kreissparkasse Köln has no owner(s) except as set forth below. For purposes of this Certification, owner means any person who, directly or indirectly, owns, controls, or has power to vote 25 percent or more of any class of voting securities or other voting interests of Kreissparkasse Köln; or (b) controls in any manner the election of a majority of the directors (or individuals exercising similar functions) of Kreissparkasse Köln. For purposes of this Certification, (i) person means any individual, bank, corporation, partnership, limited liability company or any other legal entity; (ii) voting securities or other voting interests means securities or other interests that entitle the holder to vote for or select directors (or individuals exercising similar functions); and (iii) members of the same family shall be considered one person.

*The same family means parent, spouses, children, siblings, uncles, aunts, grandparents, grandchildren, first cousins, stepchildren, stepsiblings, parents-in-law and spouses of any of the foregoing. In determining the ownership interest of the same family, any voting interest of any family member shall be taken into account.

Name:

Zweckverband für die Kreissparkasse
Köln

Adresse:

Neumarkt 18-24
50667 Köln
Germany

E. Process Agent:

The following individual or entity: CT Corporation System is a resident of the United States at the following street address: 28 Liberty Street, New York, NY 10005, and is authorized to accept service of legal process on behalf of Kreissparkasse Köln from the Secretary of the Treasury or the Attorney General of the United States pursuant to Section 5318(k) of title 31, United States Code.

F. General

Kreissparkasse Köln hereby agrees to notify in writing each Covered Financial Institution at which it maintains any Correspondent Account of any change in facts or circumstances reported in this Certification. Notification shall be given within 30 calendar days of such change.

Kreissparkasse Köln understands that each Covered Financial Institution at which it maintains a Correspondent Account may provide a copy of this Certification to the Secretary of the Treasury and the Attorney General of the

Anti-Money Laundering Acknowledgement and Global Certification Regarding Foreign Correspondents Relationships (COKSDE33)

Bank Information	
Name of our institution:	Kreissparkasse Köln, BaFin-Registration no. 100871
Place of incorporation:	Cologne
Registered address:	Neumarkt 18-24, 50667 Köln, Germany
Principal Places of Business:	Our principal places of business are the Rhein-ErftKreis, Rheinisch-Bergischer Kreis, Oberbergischer Kreis and Rhein-Sieg-Kreis.
Is our institution publicly listed on a stock exchange?	No
Members of our board of directors:	Chairman: Alexander Wüerst Managing Directors: Andree Henkel Christian Bonnen Udo Buschmann Jutta Weidenfeller Vice Managing Director: Marco Steinbach
We engage in the following major activities or provide these services:	Savings, universal and regional bank; commercial, private, mortgage and retail banking

Governing Laws	
Is our institution subject to laws and regulations against money laundering and terrorist financing?	Yes
Our relevant laws and regulations are mainly: EU-regulations - Geldwäschegesetz (GwG) - Kreditwesengesetz (KWG) - Außenwirtschaftsgesetz (AWG) - Wertpapierhandelsgesetz (WpHG) - BaFin-Verlautbarungen	
Regulatory Authority	
Is our institution subject to the supervision of any regulatory authority?	Yes

Name of the authority Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Graurheindorfer Str. 108 53117 Bonn Germany	
Is our institution subject to a regularly supervision by an auditor?	Yes

Name of the auditor Prüfungsstelle des Rheinischen Sparkassen und Giroverbandes Kirchfeldstr. 60 40217 Düsseldorf	
AML policy and practice	
Does our institution have a written policy against money laundering and terrorist financing?	Yes
Is the policy up to FATF standards?	Yes
Is the policy applicable to the headquarters, all branches and subsidiaries?	Yes
Does our institution employ agents to carry out some of the functions of our institutions and if so does our institution provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms money laundering involving our institution's products and services and internal policies to prevent money laundering?	Yes
Name and address: DSGF - Deutsche Servicegesellschaft für Finanzdienstleister GmbH Adolf-Grimme-Allee 1 50829 Köln (100% subsidiary of German Savings Financial Group - Deutsche Sparkassen-Finanzgruppe)	
We confirm that the policy and procedures have addressed to the following issues:	
Verification of the true identity of customer and beneficial owner using reliable, independent sources of documents, data or information:	Yes
Retention of all relevant documents and information in respect of customer identity and transactions according to the regulatory authority requirements:	Yes
Mechanism to detect suspicious or abnormal transaction activities, and procedures for reporting them:	Yes
Staff training program:	Yes

Independent audit and/or compliance review function to test the adequacy of policy and procedures:	Yes
Operations	
Does our institution maintain any correspondent institution relationship or conduct business with any shell bank?	No
Does our institution allow direct use of the correspondent account by third parties (Payable-through Account)?	No
Does our institution have any anonymous accounts?	No
Does our institution update our customer profile on a regular basis?	Yes
Risk Management Details	
Are there a compliance office set up for and a compliance officer in charge of supervising and coordinating efforts against money laundering and terrorist financing as well as monitoring	Yes

compliance?	
Name and contact details of the compliance officer Kreissparkasse Köln Dr. Iur. Ralf Josten, LL.M. oec, Chief Compliance Officer (CCO) Anti Money Laundering Officer Neumarkt 18-24 50667 Köln Germany	
General AML Policies, Practices and Procedures	
Is the AML compliance program approved by the Board of our institution?	Yes
Does our institution have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Yes
Has our institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes
In addition to inspections by the government supervisors/regulators, does our institution client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes

Does our institution have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	Yes
Does our institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Yes
Does our institution have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Yes
Does our institution have record retention procedures that comply with applicable law?	Yes
Is our institution`s AML policies and practices being applied to all branches and subsidiaries of our institution both in the home country and in locations outside of that jurisdiction?	Yes
Risk Assessment	
Does our institution have a risk-based assessment of its customer base and their transactions?	Yes
Does our institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that our institution has reason to believe pose a heightened risk of illicit activities at or through our institution?	Yes
Know Your Customer, Due Diligence and Enhanced Due Diligence	
Has our institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes
Does our institution have a requirement to collect information regarding its customers' business activities?	Yes
Does our institution assess its customers' AML policies or practices?	Yes
Does our institution have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes
Does our institution have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Yes
Does our institution complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes
Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	
For the identification and reporting of transactions that are required to be reported to the authorities does our institution have policies or practices?	Yes
Does our institution have procedures to identify transactions structured to avoid such obligations where cash transaction reporting is mandatory?	there is no mandatory reporting

Does our institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes
Does our institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes
Transaction Monitoring	
Does our institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc.?	Yes
AML Training	
Does our institution provide AML training to relevant employees that includes: - Identification and reporting of transactions that must be reported to government authorities - Examples of different forms of money laundering involving the products and services of our institution - Internal policies to prevent money laundering.	Yes
Does our institution retain records of its training sessions including attendance records and relevant training materials used?	Yes
Does our institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes
Does our institution employ third parties to carry out some of the functions of our institution?	Yes
Does our institution provide AML training to relevant third parties, if the answer to the last question is yes, that includes: - Identification and reporting of transactions that must be reported to government authorities - Examples of different forms of money laundering involving products and services of our institution - Internal policies to prevent money laundering.	Yes
Cologne, August 18, 2022	

