

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

<b>Bank Information</b>	
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-Erft-Kreis, 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: Dr. Klaus Tiedeken Wolfgang Schmitz Christian Bonnen Udo Buschmann Vice Managing Director: Jutta Weidenfeller
We engage in the following major activities or provide these services:	Savings, universal and regional bank; commercial, private, mortgage and retail banking

<b>Governing Laws</b>	
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	
<b>Regulatory Authority</b>	
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	
<b>AML policy and practice</b>	
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)	
<b>We confirm that the policy and procedures have addressed to the following issues:</b>	
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
<b>Operations</b>	
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
<b>Risk Management Details</b>	
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 Michael Pecher Anti Money Laundering Officer Neumarkt 18-24 50667 Köln Germany	
<b>General AML Policies, Practices and Procedures</b>	
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
Are 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
<b>Risk Assessment</b>	
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
<b>Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	
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	Yes

information relating to high risk client information?	
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
<b>Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	
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
<b>Transaction Monitoring</b>	
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
<b>AML Training</b>	
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, 2 January 2018	