

Questionnaire

Anti-Money Laundering – Anti-Terrorist Financing – Know Your Customer

Landesbank Hessen-Thüringen Girozentrale including its foreign branch offices and subsidiaries (hereinafter referred to as "Helaba") have implemented internal procedures to detect and to intercept money laundering channels or chains involving the proceeds of terrorist activities, organized crime or other serious offenses.

Please note that questions highlighted in blue are extracted from the Wolfsberg Questionnaire.

1. BANK DETAILS

Legal name of institution:	Landesbank Hessen-Thüringen Girozentrale
Registered Address:	Neue Mainzer Straße 52-58, 60311 Frankfurt am Main
Country of Registration:	Germany
Legal form:	Legal entity under public law
Name of ultimate parent institution:	-
Location of Head Office:	Frankfurt
Website	www.helaba.com
Ownership structure ¹ :	SGVHT (the savings banks and their owners in Hesse and Thuringia) 68,85% https://www.helaba.com/com/helaba/about-us/legal-form-and-owners
Current list of Members of the Board of Directors:	Mr. Grüntker, Mr. Fenk, Mr. Groß, Dr. Hosemann, Mr. Kemler, Mr. Mulfinger, Dr. Schraad

¹ **Legal form and owners:** Helaba is a legal entity under public law. The **Owners** of the Bank are the Savings Banks and Giro Association Hesse-Thuringia (SGVHT, 68,85 %), the State of Hesse (8,10 %) and the Free State of Thuringia (4,05 %), the Rhenish Savings Banks and Giro Association (RSGV, 4,75 %), the Savings Banks Association Westphalia-Lippe (SVWL, 4,75 %), FIDES Beta GmbH (4,75 %) as trustee of the German Savings Banks Association (DSGV) in its capacity as supporting institution of the Guarantee Fund of the Landesbanken and Girozentralen and FIDES Alpha GmbH (4,75 %) as trustee of the regional Sparkasse associations in its capacity as supporting institution of the regional savings banks guarantee funds. The sole members of the Savings Banks and Giro Association Hesse-Thuringia, as the major owner of Helaba, are 34 Savings Banks in Hesse and 16 in Thuringia. All Savings Banks are legal entities under public law, owned by the respective cities / regions they are located in. None of the legal entities under public law hold a 25% or greater stake.

Name of external auditors:	PricewaterhouseCoopers (PwC)
Please provide the name of the regulatory authority whose supervision your institution is subject to:	German financial and banking services regulator Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin, Federal Banking Supervisory Authority). www.bafin.de
Bank licence:	The licence of Landesbank Hessen-Thüringen Girozentrale to conduct banking business as defined in section 1 sub-section 1 KWG is deemed to have been granted according to section 61 KWG (German Banking Act), as the Landesbank conducted this business already on 1 January 1962. Furthermore the licence of Landesbank Hessen-Thüringen Girozentrale to conduct business as defined in section 1 ZAG (payment services supervision law) is deemed to have been granted according to section 35 ZAG.
Board of directors	Please refer to our homepage https://www.helaba.com/com/helaba/about-us/executive-bodies
Most recent annual report	Please refer to our homepage https://www.helaba.com/com/helaba/investor-relations/annual-reports

2. INFORMATION ABOUT FINANCIAL INSTITUTION

2.1 AML / CTF

2.1.1 POLICIES AND PROCEDURES

1.	Are there specific laws in your country on Money Laundering Prevention?	Money Laundering Act, German Banking Act		
2.	Is the AML compliance program approved by the FI's board or a senior committee?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 1
3.	a) Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML Framework?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 2
4.	Does the FI have a formal independent AML-CTF compliance function?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
5.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 3

6.	If the answer to the above question is yes, are these processes in compliance with the local Anti-Money-Laundering laws and regulations?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
7.	Do your written policies and procedures in general adhere to the Wolfsberg Standards?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
8.	Does your institution comply with the recommendations developed by the Financial Action Task Force (FATF)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
9.	In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 4
10.	Does the FI have record retention procedures that comply with applicable law?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 8
11.	Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 9
2.1.2 AML TRAINING				
12.	Does the FI provide AML training to relevant employees that includes:			Wolfsberg no. 24
	- Identification and reporting of transactions that must be reported to government authorities.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
	- Examples of different forms of money laundering involving the institution's products and services.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
	- Internal policies to prevent money laundering.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
13.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 25
14.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 26
15.	Does the FI employ third parties to carry out some of the functions of your institution?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 27

16.	If the answer to the above question is yes, does the FI provide AML training to relevant third parties that includes:			Wolfsberg no. 28
	- Identification and reporting of transactions that must be reported to government authorities.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
	- Examples of different forms of money laundering involving the institution's products and services.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
	- Internal policies to prevent money laundering	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	

2.1.3 RISK ASSESSMENT

17.	Does the FI have a risk-based assessment of its customer base and their transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 10
18.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 11

2.1.4 KNOW YOUR CUSTOMER

19.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 12
20.	Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 13
21.	Does your institution assess its FI customers' AML policies or practices?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 14
22.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 15
23.	Does the FI have procedures to establish a record for each new customer of their respective identification documents and 'Know Your Customer' information?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 16
24.	Does the FI have policies covering relationships with "Politically Exposed Persons" (PEP's), their family and close associates?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 7


2.1.5 TRANSACTION REPORTING				
25.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 18
26.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 19
27.	Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 22
2.1.6 AML TRANSACTION MONITORING				
28.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveller checks, money orders, etc?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 23
29.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 17
30.	Does your institution have an established AML Research System?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
2.2 SANCTIONS: POLICIES AND PROCEDURES				
31.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government /competent authorities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 20
32.	Does your institution maintain a correspondent bank relationship with financial institutions in Iran?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>	
33.	Does your institution maintain a correspondent bank relationship with financial institutions in the Democratic People's Republic Korea?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>	
34.	In case your institution maintains business relationships with financial institutions or other customers in Iran, can you confirm that your institution complies fully with the requirements of the FATF Statement dd. Oct 23, 2015?	Y <input type="checkbox"/>	N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

35.	In case your institution maintains business relationships with financial institutions or other customers in the Democratic People's Republic Korea, can you confirm that your institution has implemented an enhanced due diligence process which reduces the increased risk of money laundering and terrorist financing?	Y <input type="checkbox"/>	N <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.3 CORRESPONDENT BANKING			
36.	Does the FI offer correspondent banking/cash clearing services to other FIs?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
	<i>Correspondent banking is the provision of a current or liability account and related services, to another financial institution, including affiliates, used for the execution of third party payments and trade finance, as well as its own cash clearing, liquidity management and short term borrowing or investment needs in a particular currency. A Correspondent Bank is effectively acting as its Correspondent's agent or conduit, executing and/or processing payments or other transactions for the Correspondent's customers (Wolfsberg group definition)</i>		
37.	Does your bank offer "Payable Through Accounts" or any other accounts which can be used via nostro and vostro accounts?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
	<i>Payable Through Accounts are a type of correspondent banking account which is subdivided by the foreign bank into sub-accounts, each in the name of one of the foreign bank's customers, thus giving foreign banks' customers direct access to the products of the first financial institution.</i>		
38.	Does your institution provide "Nested Accounts"? <i>("Nested Accounts" can be used by a third party who has not been identified as the contracting party or his beneficial owner as if it were his own. As a result, payments to the customer or at the customer's request cannot be correctly assigned by those involved in the payment chain and therefore remain anonymous.)</i>	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
39.	If yes to the above questions, please explain how the AML/CTF risks are managed (the nature of the due diligence and controls applied to these classes of customers)	Enhanced due diligence, these include continuous monitoring.	
40.	Is your institution organized as a shell bank?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
	<i>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.</i>		
41.	Does the FI have a policy prohibiting accounts/relationships with shell banks?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/> Wolfsberg no. 5
42.	Does the FI 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?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/> Wolfsberg no. 6
43.	Does the FI have policies to reasonably ensure that	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/> Wolfsberg no. 21

	it only operates with correspondent banks that possess licenses to operate in their countries of origin?			
2.4 REGULATORY ACTIONS				
44.	Has your bank / financial institution been fined or censured for the breach of Anti-Money Laundering legislation during the last 5 years?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>	

Space for additional information:

I confirm that I am authorized to complete this document and that, to my best knowledge, the information above is current and accurately reflects our institution's AML and KYC policies.

Name:	 Kathrin Rott
Title:	Group Head of AML and Anti-Fraud
Departement:	Anti-Money Laundering and Anti-Fraud Department
Date:	04.09.2017