

## 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 some 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	<a href="http://www.helaba.com">www.helaba.com</a>
Ownership structure <sup>1</sup> :	SGVHT (the savings banks and their owners in Hesse and Thuringia) 68,85% <a href="https://www.helaba.com/com/helaba/about-us/legal-form-and-owners">https://www.helaba.com/com/helaba/about-us/legal-form-and-owners</a>

<sup>1</sup> **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.

Current list of Members of the Board of Directors:	Mr. Grüntker, Mr. Groß, Dr. Hosemann, Mr. Kemler, Mr. Mulfinger, Dr. Schraad
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). <a href="http://www.bafin.de">www.bafin.de</a>
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.
Legal Form and Owners:	Please refer to our homepage <a href="https://www.helaba.com/com/helaba/about-us/legal-form-and-owners">https://www.helaba.com/com/helaba/about-us/legal-form-and-owners</a>
Board of directors:	Please refer to our homepage <a href="https://www.helaba.com/com/helaba/about-us/executive-bodies">https://www.helaba.com/com/helaba/about-us/executive-bodies</a>
Most recent annual report:	Please refer to our homepage <a href="https://www.helaba.com/com/helaba/investor-relations/annual-reports">https://www.helaba.com/com/helaba/investor-relations/annual-reports</a>
Charter:	Please refer to our homepage <a href="https://www.helaba.com/com/helaba/about-us/legal-form-and-owners">https://www.helaba.com/com/helaba/about-us/legal-form-and-owners</a>
USA Patriot Act:	Please refer to our homepage <a href="https://www.helaba.com/com/legal-notice">https://www.helaba.com/com/legal-notice</a>
FATCA:	Please refer to our homepage <a href="https://www.helaba.com/com/legal-notice">https://www.helaba.com/com/legal-notice</a>

## 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.	Does the FI have an AML-CTF compliance program?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
3.	Does this program apply to all of the FI's domestic and foreign branches and subsidiaries?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
4.	a) 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

	b) If yes, how frequently is it updated?	Every two years at the latest		
5.	a) Do the board / senior committee receive regular management information reporting on AML-CTF matters?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
	b) If yes, with what frequency?	On an ongoing basis		
6.	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
	b) If yes, provide the name and contact details of this person.	Kathrin Rott <a href="mailto:Kathrin.Rott@helaba.de">Kathrin.Rott@helaba.de</a>		
7.	Does the FI have a formal independent AML-CTF compliance function?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
8.	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
9.	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"/>	
10.	Do your written policies and procedures in general adhere to the Wolfsberg Standards?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
11.	Does your institution comply with the recommendations developed by the Financial Action Task Force (FATF)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
12.	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
13.	Does the FI have record retention procedures that comply with applicable law?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 8
14.	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
<b>2.1.1 AML TRAINING</b>				
15.	Does the FI provide AML training to relevant employees that includes: - Identification and reporting of transactions that must be reported to government authorities.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 24
	- 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"/>	
16.	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
17.	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
18.	Does the FI have an internal permanent control / quality control function / process?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
19.	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
20.	If the answer to the above question is yes, does the FI provide AML training to relevant third parties that includes: - Identification and reporting of transactions that must be reported to government authorities.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 28
	- 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"/>	

### 2.1.1 RISK ASSESSMENT

21.	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
22.	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

### 2.1.2 KNOW YOUR CUSTOMER

23.	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
24.	Does the FI have obligations to identify the beneficial owners of their customers?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
25.	Does the FI have obligations to collect information relating to the customer's and beneficial owner(s)' source of wealth and source of funds?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
26.	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
27.	Does your institution assess its FI customers' AML	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 14

	policies or practices?			
28.	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
29.	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
30.	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
31.	Is one of the Financial Institution's beneficial owners or Senior Management Officials a Politically exposed Person?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
<b>2.1.3 TRANSACTION REPORTING</b>				
32.	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
33.	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
34.	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
<b>2.1.4 AML TRANSACTION MONITORING</b>				
35.	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
36.	What types of monitoring programmes are used to cover potentially suspicious activity?			
	Automated <input checked="" type="checkbox"/>   Manually <input type="checkbox"/>			
37.	Are cash transactions included in the programs?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
38.	Does the FI have a feedback loop providing a link between transaction monitoring output and KYC / relationship risk management?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
39.	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

<b>2.2 CUSTOMER AND PRODUCTS</b>			
40.	Please describe the nature of your business and client base:		
41.	Does your institution provide: a) Correspondent Services?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
	b) Downstream Correspondent Services to other banks or financial institutions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
		<i>On a very selective basis, and through a robust due diligence process, Helaba may provide limited downstream clearing services for other financial institutions, especially mainly saving banks in Germany and Swiss Cantonal Banks in Switzerland. We ensure that AML policies and practices are maintained by respondent FI's.</i>	
	c) 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"/>
	d) Money Service Business?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
	e) Services to Money Service Business Provider?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
	f) Services to online gambling companies	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
42.	If yes to question 42, 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.	
<b>2.3 SANCTIONS: POLICIES AND PROCEDURES</b>			
43.	Is the FI or any of its subsidiaries, joint-ventures, directors or officers the target of any economic or financial sanctions? (*1)	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
<i>(*1) Sanctions imposed by Office of the Foreign Assets Control (OFAC), the European Union (EU) or the United Nations Security Council (UNSC)</i>			

44.	Is the FI or any of its subsidiaries or joint-ventures located within or operating from any countries subject to US comprehensive sanctions? (*2)	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>	
45.	If "yes" to question 44 or 45 please provide details:			
46.	Is the FI or any of its subsidiaries or joint-ventures engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any countries subject to US comprehensive sanctions (*2) or any person or entity which is the target of any Sanctions ("Sanctioned Persons" (*3))?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
		<p><i>Helaba will comply with all applicable sanctions and measures, in particular, sanctions and measures imposed by the Federal Republic of Germany, the European Union and the United Nations insofar as they do not result in a violation of or conflict with § 7 of the German Foreign Trade Ordinance (Aussenwirtschaftsverordnung), council regulation (EC) No 2271/1996 or a similar applicable anti-boycott statute.</i></p>		
<p>(*2) Countries subject to comprehensive sanctions: As of September 1st, 2016, this includes Cuba, Iran, North Korea, Sudan, Syria and the Crimea Region.                  (*3) Any person who is a designated target of Sanctions or is otherwise a subject of Sanctions (including without limitation as a result of being (i) listed in OFAC's Specially Designated Nationals List or EU sanctions lists or UN sanctions lists or (ii) owned or controlled directly or indirectly by any person which is a designated target of Sanctions).</p>				
47.	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
48.	If "yes", a) What is the screening frequency?			
	Real time <input checked="" type="checkbox"/> Other <input type="checkbox"/>	If other, please explain:		
	b) are the screening programmes			
	Automated <input checked="" type="checkbox"/> Manual <input type="checkbox"/>			
49.	Has the financial institution established internal written policies and procedures to ensure compliance with the obligations under the applicable AML/CTF and sanctions regulations?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
50.	If "yes", are such internal policies and procedures applicable to the financial institution's foreign branches and / or subsidiaries?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
51.	Are sanctions policies and procedures approved by the board or other senior management committee?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	

52.	Is your financial institution legally obliged to comply with applicable Sanctions regulations? <sup>2</sup>	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
<b>2.4 CORRESPONDENT BANKING</b>				
53.	Does the FI offer correspondent banking/cash clearing services to other FIs?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
<p><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></p>				
54.	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"/>	
<p><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></p>				
	a) If "yes", does the FI allow direct access by its customers to its correspondent account with Helaba?	Y <input type="checkbox"/>	N <input type="checkbox"/>	
	b) How does the FI manage / mitigate the risks mentioned above? What kind of due diligence does the FI carry out with respect to this category of accounts?			
55.	Is your institution organized as a shell bank?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>	
<p><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></p>				
56.	Does the FI have a policy prohibiting accounts/relationships with shell banks?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 5
57.	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
58.	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Wolfsberg no. 21
<b>2.5 REGULATORY ACTIONS</b>				
59.	Has your AML/CTF and sanctions program received any major findings from external regulators in the last 5 years?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>	
60.	If "yes" please describe any pertinent findings and the actions taken to address them.			

<sup>2</sup> Helaba will comply with all applicable sanctions and measures, in particular, sanctions and measures imposed by the Federal Republic of Germany, the European Union and the United Nations insofar as they do not result in a violation of or conflict with § 7 of the German Foreign Trade Ordinance (Aussenwirtschaftsverordnung), council regulation (EC) No 2271/1996 or a similar applicable anti-boycott statute



61.	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"/>	
62.	If yes please provide details about the case and what measures have been put in place:			

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.

<b>Name:</b>	 Kathrin Rott
<b>Title:</b>	Group Head of AML and Anti-Fraud
<b>Departement:</b>	Anti-Money Laundering and Anti-Fraud Department
<b>Date:</b>	06.12.2017