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.

1. BANK DETAILS	
Legal name of institution:	Landesbank Hessen-Thüringen Girozentrale
Registered Address:	Neue Mainzer Straße 52-58, 60311 Frankfurt am Main / Germany
Country of Registration:	Germany
Legal form:	Legal entity under public law
Name of ultimate parent institution:	-
Location of Head Office:	Frankfurt am Main / Germany
Website	www.helaba.com
Ownership structure[1]:	SGVHT (the savings banks and their owners in Hesse and Thuringia) https://www.helaba.com/int/about-us/helaba/profile/owners-equity-executive-bodies.php

[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, 50,0 %*), the State of Hesse (30,1 %) and the Free State of Thuringia (3,5 %), the Rhenish Savings Banks and Giro Association (RSGV, 4,1 %), the Savings Banks Association WestphaliaLippe (SVWL, 4,1 %), FIDES Beta GmbH (4,1 %) 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 (4,1 %) 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 33 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

*each rounded.

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Current list of Members of the Board of Directors:	Please refer to our homepage https://www.helaba.com/int/about-us/helaba/profile/executive-bodies.php
Name of external auditors:	Ernst & Young (EY)
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.
Legal Form and Owners:	Please refer to our homepage https://www.helaba.com/int/about-us/helaba/profile/owners-equity-executive-bodies.php
Most recent annual report:	Please refer to our homepage Helaba - Financial calendar
Charter:	Please refer to our homepage https://www.helaba.com/int/about-us/helaba/profile/owners-equity-executive-bodies.php
USA Patriot Act:	Please refer to our homepage https://www.helaba.com/int/about-us/helaba/legal-notice/anti-money-laundering-patriot-act.php
FATCA:	Please refer to our homepage https://www.helaba.com/int/about-us/helaba/legal-notice/fatca.php

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 ☒	N ☐	
3.	Does this program apply to all of the FI's domestic and foreign branches and subsidiaries?	Y ☒	N ☐	
4.	a) Is the AML compliance program approved by the FI's board or a senior committee?	Y ☒	N ☐	

	b) If yes, how frequently is it updated?	In accordance with legal requirements and event driven		
5.	Do the board / senior committee receive regular management information reporting on AML-CTF matters?	Y ☒	N ☐	
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 ☒	N ☐	
	b) If yes, provide the role and contact details.	Group AMLRO Financial-Crime Risk-Management compliance_kyc@helaba.de		
7.	Does the FI have a formal independent AML-CTF compliance function?	Y ☒	N ☐	
8.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y ☒	N ☐	
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 ☒	N ☐	
10.	Do your written policies and procedures in general adhere to the Wolfsberg Standards?	Y ☒	N ☐	
11.	Does your institution comply with the recommendations developed by the Financial Action Task Force (FATF)?	Y ☒	N ☐	
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 ☒	N ☐	
13.	Does the FI have record retention procedures that comply with the Money Laundering Act?	Y ☒	N ☐	
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 ☒	N ☐	
2.1.1 AML TRAINING				
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 ☒	N ☐	
	- Examples of different forms of money laundering involving the institution's products and services.	Y ☒	N ☐	

	- Internal policies to prevent money laundering.	Y ☒	N ☐	
16.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y ☒	N ☐	
17.	Does the FI employ third parties to carry out some of the functions of your institution?	Y ☒	N ☐	In parts we use Savings Banks for CDD within the framework of legal requirements, but not generally for products related to international payments.
2.1.1 RISK ASSESSMENT				
18.	Does the FI have a risk-based assessment of its customer base and their transactions?	Y ☒	N ☐	
2.1.2 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 ☒	N ☐	
20.	Does the FI have obligations to identify the beneficial owners of their customers?	Y ☒	N ☐	
21.	Does the FI have a requirement to collect information regarding its customers' business activities?	Y ☒	N ☐	
22.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y ☒	N ☐	
23.	Does the FI have policies covering relationships with "Politically Exposed Persons" (PEP's), their family and close associates?	Y ☒	N ☐	
2.1.3 TRANSACTION REPORTING				
24.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y ☒	N ☐	
25.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y ☒	N ☐	

26.	Does the FI adhere to the Wolfsberg Transparency Principles in terms of not changing a party and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	Y ☒	N ☐	
2.1.4 AML TRANSACTION MONITORING				
27.	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 ☒	N ☐	
28.	What types of monitoring programmes are used to cover potentially suspicious activity?			
	Automated ☒ Manually ☒			
29.	Are cash transactions included in the programs?	Y ☒	N ☐	
30.	Does the FI have a feedback loop providing a link between transaction monitoring output and KYC / relationship risk management?	Y ☒	N ☐	

2.2 CUSTOMER AND PRODUCTS			
31.	Please describe the nature of your business and client base:		
32.	Does your institution provide: a) Correspondent Services?	Y ☒	N ☐
	b) Downstream Correspondent Services to other banks or financial institutions?	Y ☒	N ☐
		Helaba is one of 4 Landesbanken in Germany which provide services to the public Savings Banks sector. For more information on the Savings Banks Group please see "Inside the Savings Banks Group" under https://www.dsgv.de/en/facts/publications-reports.html	
	c) Nested accounts? *("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.)*	Y ☐	N ☒
	d) Money Service Business?	Y ☐	N ☒
	e) Services to Money Service Business Provider?	Y ☐	N ☒

	f) Services to online gambling companies	Y ☐	N ☒
33.	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.	

2.3 SANCTIONS: POLICIES AND PROCEDURES

34.	Is the FI or any of its subsidiaries, joint-ventures, directors or officers the target of any economic or financial sanctions? (*1)	Y ☐	N ☒

*(*1) Sanctions imposed by Office of the Foreign Assets Control (OFAC), the European Union (EU) or the United Nations Security Council (UNSC)*

35.	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 ☐	N ☒	
36.	If "yes" to question 43 or 44 please provide details:	Not applicable		
37.	Are Sanctions lists used by the FI in its sanctions screening processes?	Y ☒		N ☐
38.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government /competent authorities?	Y ☒	N ☐	
39.	If "yes", a) What is the screening frequency?			
	Real time ☒ *(transactions)* / Daily ☒ *(customers)*	If other, please explain:		
	b) are the screening programmes			
	Automated ☒ / Manual ☐			
40.	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 ☒	N ☐	
41.	If "yes", are such internal policies and procedures applicable to the financial institution's foreign branches and / or subsidiaries?	Y ☒	N ☐	
42.	Are sanctions policies and procedures approved by the board or other senior management committee?	Y ☒	N ☐	
43.	Is your financial institution legally obliged to comply with applicable Sanctions regulations?	Y ☒	N ☐	

2.4 CORRESPONDENT BANKING

44.	Does the FI offer correspondent banking/cash clearing services to other FIs?	Y ☒	N ☐	
	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)			
45.	Does your bank offer "Payable Through Accounts" or any other accounts which can be used via nostro and vostro accounts?	Y ☐	N ☒	
	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.			
46.	Is your institution organized as a shell bank?	Y ☐	N ☒	
	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.			
47.	Does the FI have a policy prohibiting accounts/relationships with shell banks?	Y ☒	N ☐	
48.	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 ☒	N ☐	
49.	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 ☒	N ☐	
2.5 REGULATORY ACTIONS				
50.	Has your AML/CTF and sanctions program received any major findings from external regulators in the last 5 years?	Y ☒	N ☐	
51.	Has your bank / financial institution been fined or censured for the breach of Anti-Money Laundering legislation during the last 5 years?	Y ☒	N ☐	
52.	If yes please provide details about the case and what measures have been put in place:	During the period addressed by BaFin (October 2022 to September 2023), certain aspects of the organization and nature of the IT monitoring system used by Helaba for payment transactions did not fully comply with regulatory requirements. Helaba is fully aware of the high importance of preventing money laundering and fraud and has further developed the relevant aspects of its organization and IT monitoring system. BaFin - Mitteilungen -		

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		Bekanntmachung zur Landesbank Hessen-Thüringen Girozentrale

Department:	Helaba Team Financial-Crime Risk-Management
Date:	26.03.2026