


Anti-Money Laundering Questionnaire

| I. General AML Policies, Practices and Procedures: | Yes | No |
|--|-------------------------------------|--------------------------|
| 1. Is the AML compliance program approved by the FI`s board or a senior committee? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Does the FI have a policy prohibiting accounts/relationships with shell banks? <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> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP`s), their family and close associates? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 8. Does the FI have record retention procedures that comply with applicable law? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| II. Risk Assessment | Yes | No |
| 10. Does the FI have a risk-based assessment of its customer base and their transactions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| III. Know Your Customer, Due Diligence and Enhanced Due Diligence | Yes | No |
| 12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. Does the FI have a requirement to collect information regarding its customers` business activities? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 14. Does the FI assess its FI customers` AML policies or practices? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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| 15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds | Yes | No |
| 18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 21. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| V. Transaction Monitoring | Yes | No |
| 22. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| VI. AML Training | Yes | No |
| 23. Does the FI 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 FI's products and services. - Internal policies to prevent money laundering. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 24. Does the FI retain records of its training sessions including attendance records and relevant training materials used? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 26. Does the FI employ third parties to carry out some of the functions of the FI? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 27. If the answer to question 26 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. - Examples of different forms of money laundering involving the FI's products and services. - Internal policies to prevent money laundering. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| VII. Financial Institution | | |
|---|---|---|
| Name: Volkskreditbank AG | | |
| Location: 4010 Linz, Rudigierstraße 5- 7, Austria | | |
| Principal place of business | Oberösterreich (Regionalbank) | |
| Date established | 1873 | |
| Registered at | Firmenbuch: Landesgericht Linz, FN 76096g | Place of the registration and registration number |
| Banking licence | (last) 14.03.2003, FMA – GZ. 235315 | Issuing date, the issuing authority and the number of the banking licence |
| Listed on | No listing | Exchanges where VKB are listed |
| Website | www.vkb-bank.at | Internet address |
| VIII. Ownership & Management Information | | |
| Ownership details/ shareholders | website: www.vkb-bank.at (brief description of the bank) | |
| Members of the Board of Managing Directors | website: www.vkb-bank.at (business report) | |
| Members of the Supervisory Board | website: www.vkb-bank.at (business report) | |
| Publication of the latest financial statement and equal information | website: www.vkb-bank.at (business report) | Latest financial statement and equal information. |
| Governance Codex | <input checked="" type="checkbox"/> Yes - website: www.vkb-bank.at | Source of information |

Additional Information (Please indicate which question the information is referring to):

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| Date: 2012-01-10 |
| Name: Mag. Wolfgang Kellner |
| Title: Compliance Officer |
| Signature:  |