the Wolfsberg Group

Financial Institution Name: Location (Country):

Volkskreditbank AG Austria

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	iterially different than its Entity Head Office, a separate questionnaire can Question	Answer
The second secon	& OWNERSHIP	
1. ENTITE	Full Legal Name	
	ruii Legai Nairie	
		Volkskreditbank AG
2	Append a list of foreign branches which are covered by	A December 1
	this questionnaire	There are 32 branches, 29 branches in Upper Austria, 1 branch in Salzburg, 1 branch in Vienna and 1 branch in
		Graz (see enclosed list),
3	Full Legal (Registered) Address	
		- 11 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -
		Rudigierstraße 5-7, 4010 Linz, Austria
	-	
4	Full Primary Business Address (if different from above)	
4	I dil I liliary Business Address (il dilicicili libili abovo)	
5	Date of Entity incorporation/establishment	
		Establishment 1873
		Establishment 1970
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
	,	
0.1	Member Owned/Mutual	No
6 b	Government or State Owned by 25% or more	No
6 c		Yes
6 d	Privately Owned	185
6 d1	If Y, provide details of shareholders or ultimate	Volkskreditbank AG is 100 % owned by Volkskredit Verwaltungsgenossenschaft.
	beneficial owners with a holding of 10% or more	Volkskredit Verwaltungsgenossenschaft (based in Austria) has 16,392 cooperative members as of 31.12.2023
		(one vote each)
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	925
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	no
	services only through online channels?	INV
10	Name of primary financial regulator/supervisory authority	
		A SAME Singuist Market Authority (EMA)
		Austrian Financial Market Authority (FMA)
11	Provide Legal Entity Identifier (LEI) if available	
• •	101.00 Logar Ericky (dorinant) (LET) it dealed to)··*
		529900990PPI3K3RDT23
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	Volkskredit Verwaltungsgenossenschaft registrierte Genossenschaft mit beschränkter Haftung
		Tomorrous Tomorrous and Tomorrous To
13	Jurisdiction of licensing authority and regulator of ultimate	
. •	parent	
		Austria
	Select the business areas applicable to the Entity	
	racied, the dusiness areas additionable to the Entity	
14		Vas
14 a 14 b	Retail Banking Private Banking	Yes Yes

14 c		
140	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No.
	Multilateral Development Bank	No
141		
14 j	Wealth Management	Yes
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non-	
10 a	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	501-1000
	Total Assets	Greater than \$500 million
16 b		Oreate: 1, 1917 4000 Trimion
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	
2. PRODI	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services:	Voc.
2. PRODU 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	Yes
2. PRODI 19 19 a 19 a1	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
2. PRODI 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes Yes
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Yes No
2. PRODI 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity offer Correspondent Banking services to foreign banks?	Yes No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes No No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in	Yes No No No No No No No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No No No No No No No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes No No No No No No No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f	UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes No No No No No No No No No

10 11	Dane the Eath, how presented and assert use in	
19 a1i	Does the Entity have processes and procedures in	M-
	piaco to idontify demisered	No .
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
		No .
19 d	Domestic Control of the Control of t	
19 e	Thosa trials	No .
19 f		No
19 g	Low Price Securities	No
		No.
19 h	Payment services to non-bank entities who may then	,,,,
19 i	Payment services to non-bank entitles who may then	
	offer third party payment services to their customers?	No .
40.14	If Y, please select all that apply below?	
19 i1		No
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	

19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
		No
191	Sponsoring Private ATMs	
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 0	Virtual Assets	No
	For each of the following please state whether you	
19 p	offer the service to walk-in customers and if so, the applicable level of due diligence:	
10 -1	Check cashing service	No
19 p1	If yes, state the applicable level of due diligence	
19 p1a		
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
	If yes, state the applicable level of due diligence	
19 p3a		No
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	if appropriate, provide any additional information/context to the answers in this section.	
3. AML, CT	FF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
		Yes
22 c	Beneficial Ownership	
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
	Independent Testing	Yes
22 g		
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
	The state of the s	Yes
	PEP Screening	
22 j		Yes
	PEP Screening Risk Assessment Sanctions	

22 m		Yes
22 n	Treating erre	Yes
22 o		Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least approach by the Board or equivelent Copies	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions	Yes
26	programme? Does the Entity use third parties to carry out any	N
	components of its AML, CTF & Sanctions programme:	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4 ANTIP	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	remaintent with configurate ARC regulations and	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for	Yes
33	coordinating the ABC programme? Does the Entity have adequate staff with appropriate	
33	levels of experience/expertise to implement the ABC	Yes
24	programme? Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	1007 de production de la constant de
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or	Yes
35 b	to the first term of the second term of the second term of the second terms of the sec	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the	Yes
37	effectiveness of their ABC programme? Does the Board receive, assess, and challenge regular	Yes
20	reporting on the status of the ABC programme? Has the Entity's ABC Enterprise Wide Risk Assessment	
38		Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No
40	Does the Entity's ABC EWRA cover the inherent risk	
40 a	components detailed below: Potential liability created by intermediaries and other	No
40 b	third-party providers as appropriate Coπuption risks associated with the countries and industries in which the Entity does business, directly or	
40 c	through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or	No
40 d	public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes

40 -	Changes in business activities that may materially	
40 e	increase the Entity's corruption risk	No
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	Vac
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c		Yes
42 d		Yes
42 e	subject to ABC risk have been outsourced	No .
42 f	(contractors/consultants)	No .
43	specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1		No
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 1	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	No
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
C AME C	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent	
54 a	risk components detailed below: Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h 56	Management Information Has the Entity's AML & CTF EWRA been completed in	Yes Yes
56 a	the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
FO =	periodical deligional deliginal policiti	Van
	Customer Due Diligence	Yes
58 a	Customer Due Diligence Governance	Yes
58 b	Governance	
		Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
60	are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
00 a	and the branch/es that this applies to	
	and the branchies that this applies to	
61	If appropriate, provide any additional information/context	
	to the answers in this section	
- 1010	200 1500	
	CDD and EDD	Van
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	Ven
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
-	when conducting CDD? Select all that apply:	Ven
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to	25%
	beneficial ownership identification?	25%
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	165
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
	Political data and hadistals at a section of the se	
68	For high risk non-individual customers, is a site visit a part	No
	of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	Voe
	customers for Adverse Media/Negative News?	Yes
	1000	
69 a	If Y _* is this at:	Vac
69 a 69 a1 69 a2	If Y, is this at: Onboarding KYC renewal	Yes Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
	they are FEFS, or controlled by FEFS?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
	KYC renewal	Yes
71 a2		Yes
71 a3	Trigger event	Tes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes	
13	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	165
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	
74 a4	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	Yes
	Other (Please specify)	
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current	
10		Yes
	and past periodic or rigger overtide diligence fevicine:	P.550, 1
76	From the list below, which categories of customers or	
70	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
		EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	
76 i	Non-account customers	Prohibited
76	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
761	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Prohibited
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
	Precious metals and stones	EDD on risk-based approach
76 q	Red light businesses/Adult entertainment	EDD on risk-based approach
76 r	Regulated charities	EDD on risk-based approach
76 s		
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 w 76 x	Used Car Dealers	EDD on risk-based approach
76 w	Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach
76 w 76 x	Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach
76 w 76 x	Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach
76 w 76 x	Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach
76 w 76 x	Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach
76 x 76 y	Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach
76 x 76 y	Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach
76 x 76 y	Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach
76 w 76 x 76 y	Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	EDD on risk-based approach
76 x 76 y	Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach

78 a 79	If V indicate who excelded the approval:	Compliance
	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding	Compliance
	entities that handle client money such as lawyers,	No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	
80	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	res
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
	to the answers in this section,	
8 MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
04 -	transactions for suspicious activities? If manual or combination selected, specify what type	
84 a	of transactions are monitored manually	
	St. Landedicha are monitored mandally	
	Market and the second and internal	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
04.51	the name of the vendor/tool?	
		SironAML Pro
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	* 0.550 H
04 03	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	100
85 a	If Y, does the Entity have policies, procedures and	Van
	processes to comply with suspicious transaction	Yes
86	reporting requirements? Does the Entity have policies, procedures and processes	
00	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	G12
	Request For Information (RFIs) from other entities in a	Yes
	timely manner? Does the Entity have processes in place to send	
89	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
	Confirm that all responses provided in the above Section	Yes
90		100
90	are representative of all the LE's branches	
90 90 a	If N, clarify which questions the difference/s relate to	
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
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90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to If appropriate, provide any additional information/context to the answers in this section.	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	- Control Cont
		FM-GwG, WiEREG, circulars of the Austrian Financial Market Authority (FMA)
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	No
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	103
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at	Yes
	foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	SironEmbargo
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

### 115 a ### 116 ###			
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preventing & detecting fraud?	125 a 126	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. Does the Entity have policies in place addressing fraud risk? Does the Entity have a dedicated team responsible for	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address. GPS location, and/or device ID?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
132	if appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement Wellsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance QR equivalent)		
Volkskreditbank AG (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to romain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts,		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obbigations		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards		
The Financial Institution further certifies it complies with I is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles, The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
L Karf Durstberger (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDD are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I. Mag. Peler Richtsfeld(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest being and that I am authorised to execute this declaration on behalf of the Financial Institution.		
4.12.24 (Signature & Date)		
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