

General Statement on Observance of Anti-Money Laundering Requirements

The following contains information on supervision, policies and activities of SÜDWESTBANK that are in place to prevent the use of SÜDWESTBANK for money laundering purposes and the funding of terrorism:

Know Your Customer (KYC)

SÜDWESTBANK has its headquarters in Stuttgart, Germany, and is supervised by the German Federal Financial Supervisory Agency (BaFin). The confirmation that SÜDWESTBANK is licensed under the BaFin number 102196 to conduct banking activities can be found on the BaFin website www.bafin.de.

The latest annual report of SÜDWESTBANK, the list of current Board members and further information is available on our website under the following link: www.suedwestbank.de/ueber-uns/geschaeftsbericht.php

Anti-Money Laundering (AML)

SÜDWESTBANK is subject to provisions on Anti-Money Laundering (AML) under German and EU Law, which are in accordance with the Financial Action Task Force (FATF) recommendations. The Federal Republic of Germany is a member country of the FATF. This means in particular that SÜDWESTBANK has to identify its clients and establish the beneficial owner's identity. The AML compliance policies, approved by the Management Board, include among others the processes for the identification of customers and establishing the identity of the beneficial owner. The policies also cover the collection of information regarding customers' business activities, relationships with Politically Exposed Persons and record retention procedures. Furthermore, SÜDWESTBANK regularly provides AML training to relevant employees and does not provide banking services to any bank that does not maintain a physical presence in any country and that is not a regulated affiliate. The Anti-Money Laundering Policies are applicable to the head office and branches alike and are in accordance with the Wolfsberg Anti-Money Laundering Principles.

SÜDWESTBANK has prepared a Wolfsberg Questionnaire (see download document [Wolfsberg AML Questionnaire](#)) for use by any financial institution that requires an AML Questionnaire from SÜDWESTBANK. Please use this Wolfsberg Questionnaire instead of asking SÜDWESTBANK to complete a separate AML Questionnaire form.

Patriot Act

More information is available in the following download documents

- [US Patriot Act Information](#)
- [US Patriot Act Certification Annex H](#)

Transaction Monitoring (STR/SAR)

SÜDWESTBANK has an automated monitoring programme for unusual and potentially suspicious activity. Due to the statutory provisions of German Law, a report to the Authorities must be submitted if the assets involved in the business are connected with a criminal organization or money laundering originates from a crime or serve the financing of terrorism.

Sanction Screening

All EU and German embargo regulations are binding for the SÜDWESTBANK.

The Bank's Embargo programme enforces controls on new clients and on existing clients as well as requirements for filtering of transactions against embargo lists. These lists are compiled on the basis of multiple sources including the BaFin, the EU and the Office of Foreign Assets Control (OFAC) before transactions are executed.