the Wolfsberg Group

Financial Institution Name: Location (Country) : IKB Deutsche Industriebank AG
Düsseldorf / Germany

No#	Question	Answer
I. ENITTY	& OWNERSHIP	
	Full Legal name	IKB Deutsche Industriebank AG
	Append a list of foreign branches which are covered by this questionnaire	The questionnaire is inclusive of all subsidiaries and branches of IKB Deutsche Industriebank AG
3	Full Legal (Registered) Address	Wilhelm-Bötzkes-Straße 1, 40474 Düsseldorf
}	Full Primary Business Address (if different from above)	n/a
5	Date of Entity incorporation/establishment	30th September 1924
3	Select type of ownership and append an ownership chart if available	
3 a	Publicly Traded (25% of shares publicly traded)	No
i a1	If Y, indicate the exchange traded on and ticker symbol	n/a
6 b	Member Owned/Mutual	No
S C	Government or State Owned by 25% or more	No
d d	Privately Owned	Yes
3 d1	If Y, provide details of shareholders or ultimate beneficial	165
o a 1		LSF6 Europe Financial Holdings L.P., Delaware / USA
7	owners with a holding of 10% or more	0%
2	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
3 a	If Y, provide the name of the relevant branch/es which operate under an OBL	n/a
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	PWEFG14QWWESISQ84C69
2. AML. C	TF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Not applicable
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11]	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 1	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n		Yes
	Training and Education	Yes
11 o	Transaction Monitoring	res
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
13 а	If Y, provide further details	IKB uses third-party vendor systems for automated PeP, AML and sanction lists screening. All screening parameters and applied screening processes are definded by IKB's Anti-Financial Crime department which also monitors and decides on all AML, CTF and Sanctions related matters incl. any reported suspicious activities
14	Does the entity have a whistleblower policy?	Yes
	RIBERY & CORRUPTION	
15	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report	Yes
16	bribery and corruption? Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17		

	4-4 Line of Defence	Vaa
17 b 17 c	1st Line of Defence 2nd Line of Defence	Yes Yes
17 d	3rd Line of Defence	Yes
17 u	Third parties to which specific compliance activities	
17 6	subject to ABC risk have been outsourced	Not Applicable
17 f	Non-employed workers as appropriate	V
	(contractors/consultants)	Yes
4. AML,	CTF & SANCTIONS POLICIES & PROCEDURES	
18	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect	
1 14	and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and	Yes
	fictitious named accounts	
19 b	Prohibit the opening and keeping of accounts for	Yes
10	unlicensed banks and/or NBFIs	
19 c	Prohibit dealing with other entities that provide banking	Yes
40.4	services to unlicensed banks	V
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services	Yes
40.f	to shell banks	
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 g	Prohibit opening and keeping of accounts for any of	
13 9	unlicensed/unregulated remittance agents, exchanges	
	houses, casa de cambio, bureaux de change or money	Yes
	transfer agents	
19 h	Assess the risks of relationships with domestic and foreign	
	PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
	employees	
19 ј	Outline the processes regarding screening for sanctions,	Yes
	PEPs and Adverse Media/Negative News	res
20	Has the Entity defined a risk tolerance statement or similar	
	document which defines a risk boundary around their	Yes
	business?	
21	Does the Entity have record retention procedures that	Yes
0.4	comply with applicable laws?	
21 a	If Y, what is the retention period?	5 years or more
	CDD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD	V
	must be completed, e.g. at the time of onboarding or within	Yes
24	30 days? Which of the following does the Entity gather and retain	
24	when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b		
_~ ~		lyes
24 c	Expected activity	Yes Yes
24 c	Expected activity Nature of business/employment	Yes
24 d	Expected activity Nature of business/employment Ownership structure	Yes Yes
24 d 24 e	Expected activity Nature of business/employment Ownership structure Product usage	Yes Yes Yes
24 d 24 e 24 f	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship	Yes Yes Yes Yes Yes
24 d 24 e 24 f 24 g	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds	Yes Yes Yes Yes Yes Yes
24 d 24 e 24 f 24 g 24 h	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth	Yes Yes Yes Yes Yes
24 d 24 e 24 f 24 g 24 h 25	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified:	Yes Yes Yes Yes Yes Yes Yes Yes
24 d 24 e 24 f 24 g 24 h 25 25 a	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership	Yes Yes Yes Yes Yes Yes Yes Yes Yes
24 d 24 e 24 f 24 g 24 h 25 25 a 25 a1	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified?	Yes
24 d 24 e 24 f 24 g 24 h 25 25 a 25 a 25 a1 25 b	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable)	Yes
24 d 24 e 24 f 24 g 24 h 25 25 a 25 a 25 a1 25 b	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable) Key controllers	Yes
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24 d 24 e 24 f 24 g 24 h 25 25 a 25 a 25 a1 25 b	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable) Key controllers Other relevant parties Does the due diligence process result in customers	Yes
24 d 24 e 24 f 24 g 24 h 25 25 a 25 a1 25 b 25 c 25 d 26	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable) Key controllers Other relevant parties Does the due diligence process result in customers receiving a risk classification?	Yes
24 d 24 e 24 f 24 g 24 h 25 25 a 25 a 25 a 25 b 25 c 25 d	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable) Key controllers Other relevant parties Does the due diligence process result in customers receiving a risk classification? Does the Entity have a risk based approach to screening	Yes
24 d 24 e 24 f 24 g 24 h 25 25 a 25 a1 25 b 25 c 25 d 26	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified: Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable) Key controllers Other relevant parties Does the due diligence process result in customers receiving a risk classification? Does the Entity have a risk based approach to screening customers and connected parties to determine whether they	Yes
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30 w Used 30 x Virtua 30 y Other 31 If restrict 6. MONITORING 32 Does the monitor suspicion 33 What is transac 33 a If mare transac 34 Does the suspicion 34 a If y, description of the process of the pr	Car Dealers I Asset Service Providers	
30 x Virtua 30 y Other 31 If restrict 6. MONITORING 32 Does the monitor suspicite 33 What is transac 33 a If man transa 34 Does the suspicite 34 a If Y, description of the procedure of the proc	Asset Service Providers	Do not have this category of customer of industry
30 y Other 31 If restrict 6. MONITORING 32 Does th monitor suspicit 33 What is transac 33 a If man transa 34 Does th suspicit 34 a If Y, d proce- report		Postdeted
31 If restrict 6. MONITORING 32 Does the monitor suspicite stransact 33 a If man transact 34 Does the suspicite suspicite stransact 34 process the suspicite stransact suspicite stransact suspicite stransact stransac		Restricted
6. MONITORING 32 Does th monitor suspicio 33 What is transac 33 a If man transa 34 Does th suspicio 34 a If Y, d proce- report		IKB Deutsche Industriebank AG does not engage in business relationships with
32 Does the monitor suspicion of transacts and s	cted, provide details of the restriction	certain clients from defined high risk industries
32 Does the monitor suspicion of transac and a suspicion and a	& REPORTING	
33 What is transac 33 a If man transa 34 Does th suspicio 34 a If Y, d proce-	ne Entity have risk based policies, procedures and ring processes for the identification and reporting of ous activity?	Yes
transa 34 Does th suspicio 34 a If Y, d proce- report	s the method used by the Entity to monitor ctions for suspicious activities?	Combination of automated and manual
suspicio 34 a If Y, d proce- report	nual or combination selected, specify what type of actions are monitored manually	Automated daily transaction reporting based on defined risk parameters, manual review of all reported transactions
proce report	ne Entity have regulatory requirements to report ous transactions?	Yes
	loes the Entity have policies, procedures and sses to comply with suspicious transactions ting requirements?	Yes
review	ne Entity have policies, procedures and processes to and escalate matters arising from the monitoring of er transactions and activity?	Yes
7. PAYMENT TR		
36 Does th	ne Entity adhere to the Wolfsberg Group Payment arency Standards?	Yes
37 Does the comply	ne Entity have policies, procedures and processes to with and have controls in place to ensure	
	ance with:	Van
	Recommendation 16	Yes
	Regulations	Yes AMI OTE and a sixty of the
	Specify the regulation	National German AML/CTF and sanctions law mainly adapted from EU regulations.
	explain	
8. SANCTIONS		
38 Does the manage applica busines foreign		Yes

	In the Fact to the	T
39	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	Yes
		Tes .
	stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
0	Does the Entity screen its customers, including beneficial	
U	ownership information collected by the Entity, during	
	onboarding and regularly thereafter against Sanctions	Yes
	Lists?	
11	Select the Sanctions Lists used by the Entity in its sanctions	
•	screening processes:	
l1 a	Consolidated United Nations Security Council Sanctions	Used for screening customers and beneficial owners and for filtering transactional
	List (UN)	data
l1 b	United States Department of the Treasury's Office of	Head for recogning purchases and honoficial current (i.e. reference data)
	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
l1 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional
14 1	Office of Financial Cartelloris Implementation Film (CFC)	data Used for screening customers and beneficial owners and for filtering transactional
l1 d	European Union Consolidated List (EU)	data
1 e	Lists maintained by other G7 member countries	Not used
1 f	Other (specify)	Relevant German sanctions lists
2	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	No
	member countries have enacted comprehensive jurisdiction-	
	based Sanctions?	
. TRAIL	VING & EDUCATION	
13	Does the Entity provide mandatory training, which includes:	
l3 a	Identification and reporting of transactions to government	Yes
	authorities	res
13 b	Examples of different forms of money laundering, terrorist	
	financing and sanctions violations relevant for the types of	Yes
	products and services offered	
13 c	Internal policies for controlling money laundering, terrorist	Yes
	financing and sanctions violations	
43 d	New issues that occur in the market, e.g. significant	Yes
	regulatory actions or new regulations	
44	Is the above mandatory training provided to :	
14 a	Board and Senior Committee Management	Yes
14 b	1st Line of Defence	Yes
14 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been	Not Applicable
	outsourced	
44 f	Non-employed workers (contractors/consultants)	Yes
10. AUD	The state of the s	
45	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent third	Yes
	party, or both, that assesses FCC AML, CTF, ABC, Fraud	
	and Sanctions policies and practices on a regular basis?	<u></u>
Signature	Domo	
Signature	rage	
Volfsberg	Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2	2)
		-7
IKB Deuts	che Industriebank AG	
	20.49 (5	(Financial Institution name)
Florian P	awlizki (Senior Compliance Manager- Second Line representative)	certify that I have read and understood this
	n, that the answers provided in this Wolfsberg FCCQ are complete ar	
accidiation	i, that the allestere provided in this frenching i doc are complete at	ia contest to my noncest content
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January 2,		
-	(Signature & Date	9)
	v —	