#### the Wolfsberg Group

Financial Institution Name:	Kreissparkasse Heilbronn
Location (Country) :	Heilbronn (Germany)

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#	Question	Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	Kreissparkasse Heilbronn
2	Append a list of foreign branches which are covered by this questionnaire	our entire Branches can be found on our Homepage under the following link: https://www.sparkasse-heilbronn.de/de/home/service/filiale-finden.html? aff=sbkfilialfinder&n=true&stref=service_links#all-station-list
3	Full Legal (Registered) Address	Am Wollhaus 14 74072 Heilbronn Germany
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	founded in 1856 Fusion of Kreissparkasse Heilbronn and Sparkasse Eppingen at 1st January 2002
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	-
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	-
7	% of the Entity's total shares composed of bearer shares	100% (Rural District of Heilbronn / Heilbronn, Eppingen, Gemmingen, Ittlingen and Kirchardt)
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	-
9	Name of primary financial regulator / supervisory authority	BaFin

-	To	
10	Provide Legal Entity Identifier (LEI) if available	529900LG0ZUI1LJU1P46
11	Provide the full legal name of the ultimate parent	No
	(if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator	Not applicable
	of ultimate parent	пот арріїсавіе
13	Select the business areas applicable to the	
	Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	
13 0	i iivate banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	· · · · · · · · · · · · · · · · · · ·
10 0	Transactional banking	Yes
13 e	Investment Banking	No
13 f	Financial Markets Trading	
131	I mandal warkets frauling	No
13 g	Securities Services / Custody	Yes
13 h	Broker / Dealer	
1311	Blokel / Dealel	No
13 i	Multilateral Development Bank	No
42:	Other	
13 j	Other	
14	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	No
	customers primarily resident in a different jurisdiction to the location where bank services	
	are provided.)	
14 a	If Y, provide the top five countries where the non- resident customers are located.	
	resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	
10 0	Transor of employees	1001-5000
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the	Orodioi didir 9000 fillilloff
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are	Yes
	representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	
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2. PRO	2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and		
17 a	services:  Correspondent Banking		
17 a1	lif Y	No	
17 41			
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?		
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?		
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?		
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?		
17 a6	Does the Entity allow downstream relationships with Foreign Banks?		
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?		
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?		
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?		
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?		
17 b	Private Banking (domestic & international)	Yes	
17 с	Trade Finance	Yes	
17 d	Payable Through Accounts	No	
17 e	Stored Value Instruments	Yes	
17 f	Cross Border Bulk Cash Delivery	No	
17 g	Domestic Bulk Cash Delivery	No	
17 h	International Cash Letter	Yes	
17 i	Remote Deposit Capture	No	
17 j	Virtual /Digital Currencies	No	
17 k	Low Price Securities	No	
17 I	Hold Mail	No	
17 m	Cross Border Remittances	No	
17 n	Service to walk-in customers (non-account holders)	No	
17 о	Sponsoring Private ATMs	No	
17 p	Other high risk products and services identified by the Entity	No	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
18 b	If appropriate, provide any additional information / context to the answers in this section.		

0 414	OTE & CANOTIONS PROCESSING	
	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	Yes
19 b	Cash Reporting	Yes
19 с	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 о	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Annually
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
23 a	If Y, provide further details	For the progress of legitimation
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI	BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	
	programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	Yes
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	Yes
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
	lo the Entity of 150 programme applicable to:	Not Applicable
30	Does the Entity have a global ABC policy that:	
30	Does the Entity have a global ABC policy that.	
20.0	Drahikita the giving andiving of both - C	
30 a	Prohibits the giving and receiving of bribes?	
	This includes promising, offering, giving, solicitation or receiving of anything of value,	Yes
	directly or indirectly, if improperly intended to	res
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding	
30 5	interaction with public officials?	Yes
30 c	Includes a prohibition against the falsification of	
30 C	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	Yes
	Entity)?	
0.4	**	
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
00		
32	Does the Entity's Board or Senior Management	L.
	Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide	Yes
	ABC risk assessment?	
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating	
	that is the net result of the controls effectiveness	Yes
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
35 a	Potential liability created by intermediaries and	
" "	other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries	
33 5	and industries in which the Entity does business,	Yes
	directly or through intermediaries	150
25.0		
35 c	Transactions, products or services, including	V
	those that involve state-owned or state- controlled entities or public officials	Yes
05.1	· · · · · · · · · · · · · · · · · · ·	
35 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable	Yes
	donations and political contributions	
35 e	Changes in business activities that may	Yes
	materially increase the Entity's corruption risk	। <del>। । । । । । । । । । । । । । । । । । </del>
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	

37	Does the Entity provide mandatory ABC training	
	to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 с	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
37 f	Non-employed workers as appropriate (contractors/consultants)	No
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCEI	DURES
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to	
40 a	reasonably prevent, detect and report:  Money laundering	
40 b		Yes
	Terrorist financing	Yes
40 с	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	Yes
42 a1	If Y, does the Entity retain a record of the results?	Yes
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures	
43 a	that:  Prohibit the opening and keeping of anonymous	Yes
43 b	and fictitious named accounts  Prohibit the opening and keeping of accounts for	Yes
43 c	unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide	
43 d	banking services to unlicensed banks  Prohibit accounts/relationships with shell banks	Yes
	·	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 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
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	Yes
45	boundary around their business?  Does the Entity have a record retention	Yes
45 a	procedures that comply with applicable laws?  If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	Please note that Question 42a ist answered with "yes" but our policies and procedures are only gapped against/compared to US Standards on transaction levels and not individual levels.

6. AMI	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 с	Channel	Yes
50 d	Geography	Yes

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51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7 1/1/2	CDD and EDD	
	, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	Not Applicable
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

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60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 с	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	Not Applicable
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	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
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Automated
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
70 a	Non-account customers	EDD & restricted on a risk based approach
70 b	Non-resident customers	EDD & restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibited
70 e	PEPs	EDD & restricted on a risk based approach
70 f	PEP Related	EDD & restricted on a risk based approach
70 g	PEP Close Associate	EDD & restricted on a risk based approach
70 h	Correspondent Banks	Do not have this category of customer or industry
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	Not EDD, not restricted or not prohibited on a risk based approach
70 j	Atomic power	Not EDD, not restricted or not prohibited on a risk based approach
70 k	Extractive industries	Not EDD, not restricted or not prohibited on a risk based approach
70 I	Precious metals and stones	Not EDD, not restricted or not prohibited on a risk based approach
70 m	Unregulated charities	Not EDD, not restricted or not prohibited on a risk based approach
70 n	Regulated charities	Not EDD, not restricted or not prohibited on a risk based approach
70 o	Red light business / Adult entertainment	Not EDD, not restricted or not prohibited on a risk based approach
70 p	Non-Government Organisations	Not EDD, not restricted or not prohibited on a risk based approach
70 q	Virtual currencies	Not EDD, not restricted or not prohibited on a risk based approach
70 r	Marijuana	Not EDD, not restricted or not prohibited on a risk based approach
70 s	Embassies/Consulates	Not EDD, not restricted or not prohibited on a risk based approach
70 t	Gambling	Not EDD, not restricted or not prohibited on a risk based approach
70 u	Payment Service Provider	Not EDD, not restricted or not prohibited on a risk based approach
70 v	Other (specify)	Please note for the questions 70i to 70u, that we are compliant with the Anti Money Laundering Act. In our FCC programme it is strictly prohibited to enter into or maintain any business relationship that does not comply with applicable laws or is otherwise illegal.
71	If restricted, provide details of the restriction	Question 70a: Above a certain amount, additional documentation and information must be obtained from the customer.  Question 70b and 70e to 70g: Management approval is required.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	Please note for the answers of the Questions 70i to 70u the answer of Question 70v. Furthermore, we would like to point out that every illegal transaction is strictly prohibited. These business relationships have to be rejected and reported to the AML Officer.

74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	Referrals and cases through the internal and external channels will be regarded as manual.
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

DAVMENT TRANSPARENCY		
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:		
FATF Recommendation 16	Yes	
Local Regulations	Yes	
Specify the regulation	German Anti Money Laundering Law, Regullation (EU) 2015/847 ZAG (Zahlungsdiensteaufsichtsgesetz)	
If N, explain		
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes	
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes	
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes	
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, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:  FATF Recommendation 16  Local Regulations  Specify the regulation  If N, explain  Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?  Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?  Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?  Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY 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.	

Does the Eritly here a Sanctions Policy sproved by management regarding compliance with sanctions law applicable to the Entity, cluriding with respect as business conducted with, or through accounts held at foreign financial institutions?  77 Does the Entity have policies, procedures, or other control reasonably designed to prevent the use of another entity's accounts or services sanctions prohibitions applicable in the other entity (including prohibitions applicable in the other entity (including prohibitions applicable sanctions prohibitions and services are controlled to the other entity (including prohibitions such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border  89 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during orbinations and regularly thereafter against Sanctions Lists?  90 What is the method used by the Entity?  Automated  91 Does the Entity screen all sanctions relevant dida, including at a minimum, entity and location relevant information, contained in cross border transactions against Sanctions Lists?  22 What is the method used by the Entity in its sanctions account of CAC, or the Sanctions List (VM)  33 Select the Sanctions List (VM)  34 Considered Unified Alations Security Council Sanctions List (VM)  35 United States Department of the Treasury's Automated  36 Considered Unified Alation Security Council Sanctions Integrated to the Automated Security Council Sanctions Uniformation societisted Unified Alation Security Council Sanctions Uniformation or Considered Unified Alations Security Council Sanctions Uniformation Security Council Sanctions Integrated Unified Alation Security Council Sanctions Uniformation or Council Sanctions Uniformation or Council Sanctions Uniformation Security Council Sanctions Uniformation or Council Sanctions Uniformation	0. SAN	NCTIONS	
approved by management regarding compliance with sanctions this wapplicable to the Entity, including with respect its business conducted with, of through accounts held at foreign financial institutions?  77 Dee the Entity have policies, procedures, or other controles reasonably designed to prevent the use of another entity in cultiding prohibitions applicable to the other entity (including prohibitions with the other entity including prohibitions with the other entity including prohibitions with the other entity including prohibitions, such as stripping, or the resultions in another to evade applicable ancitions prohibitions, such as stripping, or the resultination of elected actions taken to evade applicable ancitions prohibitions, such as stripping, or the resultination and/or eatect actions taken, of sanctions of the resultination and or eatect actions taken, of sanctions are reliable to the resultination and or eatect actions taken, of sanctions are reliable to the resultination and or eatect actions actions, of sanctions are required to the resultination and or eatect actions actions, of sanctions and another to evade applicable ancitions prohibitions, such as stripping, or the resultination and or eatect actions actions, of sanctions and an evaluation of the resultination and actions and actions and actions actions and actions. In the sanctions are applicable and required the resultination and actions are actions. In the eaten and actions actions are actions. In the eaten and actions actions actions actions actions actions actions. In the eaten action action action and actions actions actions actions. In the eaten action		·	
compliance with sanctions law applicable to the Entity, including with respect to business conducted with, or through accounts held at foreign financial institutions?  77  787  787  787  788  788  788  78	·		
Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?  7 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity (including prohibitions within the other entity (including prohibitions, such as stripping, or the results of the controls reasonably designed to prohibit sanctions prohibitions, such as stripping, or the results of the controls reasonably designed to prohibit sanctions prohibitions, such as stripping, or the results of the controls reasonably designed to prohibit sanctions prohibitions, such as stripping, or the results of the controls reasonably designed to prohibit sanctions prohibitions, such as stripping, or the results of the control seasonably designed to prohibit sanctions prohibitions, such as stripping, or the results of the control seasonably designed to prohibition stripping, or the results of the control seasonably stripping, or the results of the control seasonable stripping or the results of the			
conducted with or through accounts held at foreign financial institutions or context controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity for under entity to violate sanctions prohibitors applicable to the other entity for under entity entity for entity en			Yes
toreign financial institutions?  Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity social in a manner causing the other entity to violate sanctions prohibitions spliciable to the other entity (including prohibitions within the other entity) (including prohibitions assign, of sanctions the entity of the entity in the entity of the entity in the entity of the entity in the entity in the entity in the entity of the entity in the entity of the entity in the entity of the entity in t			
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Same day to 2 business days			
			Same day to 2 business days

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

Does the Entity provide mandatory training, which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes Yes
which includes:  Identification and reporting of transactions to government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
government authorities  Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
Internal policies for controlling manay	
laundering, terrorist financing and sanctions violations	Yes
New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
Conduct and Culture	Yes
Is the above mandatory training provided to :	
Board and Senior Committee Management	Yes
1st Line of Defence	Yes
2nd Line of Defence	Yes
3rd Line of Defence	Yes
3rd parties to which specific FCC activities have been outsourced	Not Applicable
Non-employed workers (contractors/consultants)	Not Applicable
Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
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.	
	violations  New issues that occur in the market, e.g., significant regulatory actions or new regulations  Conduct and Culture  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  3rd parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML, CTF and Sanctions staff?  Confirm that all responses provided in the above Section TRAINING & EDUCATION 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.

12. QU	2. QUALITY ASSURANCE /COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
105 b	If appropriate, provide any additional information / context to the answers in this section.		

13. AU	3. AUDIT		
106			
.00	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:		
107 a	Internal Audit Department	Yearly	
107 b	External Third Party	Yearly	
108	Does the internal audit function or other independent third party cover the following areas:		
108 a	AML, CTF & Sanctions policy and procedures	Yes	
108 b	KYC / CDD / EDD and underlying methodologies	Yes	
108 c	Transaction Monitoring	Yes	
108 d	Transaction Screening including for sanctions	Yes	
108 e	Name Screening & List Management	Yes	
108 f	Training & Education	Yes	
108 g	Technology	Yes	
108 h	Governance	Yes	
108 i	Reporting/Metrics & Management Information	Yes	
108 j	Suspicious Activity Filing	Yes	
108 k	Enterprise Wide Risk Assessment	Yes	
108 I	Other (specify)		
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110 b	If appropriate, provide any additional information / context to the answers in this section.		

# **Declaration Statement** Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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 OR equivalent) Kreissparkasse Heilbronn (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain 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 egal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis. The Financial Institution commits to file accurate supplemental information on a timely basis. Carolin Kopp (Global Head of Correspondent Banking 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 belief, and that I am authorised to execute this declaration on behalf of the Financial nstitution Stefan Garreis (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 belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. gez. Carolin Kopp in June 2023 (Signature & Date)

(Signature & Date)

gez. Stefan Garreis in June 2023