

# the Wolfsberg Group

Financial Institution Name:  
Location (Country):

Sächsische Aufbaubank -Förderbank-  
Germany

No #	Question	Answer
<b>1 ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	Sächsische Aufbaubank -Förderbank-
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	n.a.
3	Full Legal (Registered) Address	Gerberstr. 5, 04105 Leipzig, Germany
4	Full Primary Business Address (if different from above)	Pirnaische Str. 9, 01069 Dresden, Germany
5	Date of Entity incorporation/establishment	15.09.2003
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	n.a.
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	n.a.
7	% of the Entity's total shares composed of bearer shares	n.a.
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	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	2Z7LGN9CRR5I5UEPSJ79
<b>2 AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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	No
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	Less than 5 years
<b>5. KYC, CDD and EDD</b>		
22	Does the Entity verify the identity of the customer?	Yes
23	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
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	No
25 d	Other relevant parties	No
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	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
28	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
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	No
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	No
29 a4	5 years or more	Yes
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	n.a
30	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?	
30 a	Arms, Defence, Military	EDD on risk-based approach
30 b	Respondent Banks	Do not have this category of customer or industry
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
30 c	Embassies/Consulates	Do not have this category of customer or industry
30 d	Extractive Industries	EDD on risk-based approach
30 e	Gambling customers	EDD on risk-based approach
30 f	General Trading Companies	EDD on risk-based approach
30 g	Marijuana-related Entities	EDD on risk-based approach
30 h	MSB/MVTS customers	Do not have this category of customer or industry
30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	EDD on risk-based approach
30 k	Non-resident customers	Do not have this category of customer or industry

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transact
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transact
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transact
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transact
41 e	Lists maintained by other G7 member countries	Not used
41 f	Other (specify)	n.a.
42	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
<b>9. TRAINING &amp; EDUCATION</b>		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	No
44 f	Non-employed workers (contractors/consultants)	No
<b>10. AUDIT</b>		
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 party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
<b>Signature Page</b> Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) Sächsische Aufbaubank -Förderbank-  _____ (Hagen Schlotze) (Financial Institution name)  Hagen Schlotze  I, _____ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.  Hagen Schlotze (Signature & Date) 16.1.2026		