## the Wolfsberg Group

Financial Institution Name: Location (Country): Kathrein Privatbank Aktiengesellschaft Austria

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	Kathrein Privatbank Aktiengesellschaft
2	Append a list of foreign branches which are	Kathrein Capital Management GmbH (subsidiary in Austria)
	covered by this questionnaire	That is a capital management embit (casedial), in videola,
3	Full Legal (Registered) Address	Wipplingerstr. 25, 1010 Wien
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	08.05.1996
		30.00.1330
6	Salast turns of ownership and append an owner-bi-	
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 с	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Raiffeisenbank International AG, please see OrgChart
7	% 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 🔻
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 services only through online channels?	No 🔻
10	Provide Legal Entity Identifier (LEI) if available	52900TXPMGGJR19EY42
	FF & 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 11 h 11 i	Independent Testing		
11 i	Periodic Review	Yes	
	Policies and Procedures	Yes	=
		Yes	
11 j	PEP Screening		
11 k	Risk Assessment	Yes	브
111	Sanctions	<b>+</b>	
11 m	Suspicious Activity Reporting	Yes	
11 n	Training and Education	Yes	
11 o	Transaction Monitoring	Yes	
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?	Yes	•
13 a	If Y, provide further details	RBI via Raiffeisen Service Center carries out the first voting of transaction screening	on
14	Does the entity have a whistleblower policy?	Yes	
	BRIBERY & CORRUPTION	166	
			_
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	•
16	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 a	Board and Senior Committee Management	Yes	
17 b	1st Line of Defence	Yes	
17 c	2nd Line of Defence	Yes	〓
17 d	3rd Line of Defence	Yes	=
17 u 17 e	Third parties to which specific compliance activities	res	품
	subject to ABC risk have been outsourced	Yes	lacksquare
17 f	Non-employed workers as appropriate (contractors/consultants)	No	$\blacksquare$
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 and report:		
18 a	Money laundering	Yes	V
18 b	Terrorist financing	Yes	
18 c	Sanctions violations	Yes	$\blacksquare$
19	Does the Entity have policies and procedures that:		
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<b> </b>
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<u> </u>
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<u> </u>
19 d	-	Voc	
	Prohibit accounts/relationships with shell banks	Yes	늗
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	lacksquare
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<b>V</b>
19 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	•
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	•
	Define the process for escalating financial crime	Van	
19 i	risk issues/potentially suspicious activity identified by employees	Yes	Ľ

similar document which defines a risk boundary around their business?  21 a Does the Entity have record retention procedures between the tomage of the process of the proce				
that comply with applicable lawe?  If y, what is the releasion period?  S, KYC, CDD and EDD  22  Dees the Entity verify the identity of the customer?  23  Dees the Entity verify the identity of the customer?  24  Dees the Entity verify the identity of the customer?  25  Dees the Entity verify the identity of the customer?  26  Dees the Entity verify the identity of the customer?  27  28  Which of the following does the Entity gather and relation when conclusion (DDP Select all that apply: Verify the identity of the customer or evaluation when conclusion (DDP Select all that apply: Verify the identity of the customer of the identity of the identity of the customer of the identity of the identit	20	similar document which defines a risk boundary	Yes	•
5. KYC, CDD and EDD  22 Does the Entity verify the identity of the customer?  23 Does the Entity verify the identity of the customer?  24 Does the Entity spolutes and procedures set out when opportunity of the customer?  25 Does the Entity spolutes and procedures set out when opportunity of the Customer is continued by the Entity of the	21	that comply with applicable laws?	Yes	<b>V</b>
Does the Entity verify the identity of the customer?  Do to the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of conboarding or within 30 days?  Which of the following does the Entity gather and retain when conducting CDD's Select all that apply:  24 a Customer identification  24 b Expected activity  24 c Nature of business/employment  25 c Ney conducting CDD's Select all that apply:  26 p Product usage  Peases select  27 Peases select  28 Peases select  29 Peases select  29 Age and to the following identified:  25 a Very care of funds  Peases select  25 Are each of the following identified:  25 a Very care of the Control ownership  26 Age and the following identified:  27 Are each of the following identified:  28 a Very controllers  29 a Very controllers  20 Controllers  Does the Entity have a rick based approach to software in the Entity have a rick based approach to software which the the processes for selection on year or PEPs, or controlled by PEPsy  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies seased on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is KYC renewed at defined frequencies on the Do not have this category of outstomer or industry  29 a Is KYC renewed at defined frequencies based on risk rating (Pethods Reviews)?  29 a Is R	21 a	If Y, what is the retention period?	E	
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risk rating (Periodic Reviews)?  29 a1	28	processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by	Yes	•
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29 a2 1 – 2 years Please select  29 a3 3 – 4 years  29 a4 5 years or more  29 a5 Trigger-based or perpetual monitoring reviews  29 a6 Other (please specify)  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 Do not have this category of customer or industry  30 b Respondent Banks Do not have this category of customer or industry  30 b Respondent Banks Do not have this category of customer or industry  30 c Embassies/Consulates Do not have this category of customer or industry  30 d Extractive industries Do not have this category of customer or industry  30 d General Trading Companies Do not have this category of customer or industry  30 f General Trading Companies Do not have this category of customer or industry  30 g Marijuana-related Entities Do not have this category of customer or industry  30 h MSB/MVTS customers Do not have this category of customer or industry  30 i Non-account customers  30 j Non-Government Organisations		111	Yes	
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Non-resident customers EDD on risk-based approach	•	2		
	30 K	Non-resident customers	EDD on risk-based approach	

30 I	Nuclear power	Do not have this cotogon, of sustances as industrial	
30 m	Nuclear power	Do not have this category of customer or industry	
30 m	Payment Service Providers	Do not have this category of customer or industry	
	PEPs	Always subject to EDD	
30 o	PEP Close Associates	Always subject to EDD	
30 p	PEP Related	Always subject to EDD	
30 q	Precious metals and stones	Do not have this category of customer or industry	Y
30 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry	V
30 s	Regulated charities	EDD on risk-based approach	
30 t	Shell banks	Prohibited	$\blacksquare$
30 u	Travel and Tour Companies	Do not have this category of customer or industry	
30 v	Unregulated charities	Prohibited	$\blacksquare$
30 w	Used Car Dealers	Do not have this category of customer or industry	V
30 x	Virtual Asset Service Providers	Prohibited	$\blacksquare$
30 y	Other (specify)		
31	If restricted, provide details of the restriction	according to our code of conduct and sensitve business policies (nuclei energy, gambling, stelle strategym thermal coal)	ar
6. MONIT	ORING & REPORTING		
32	Does the Entity have risk based policies, procedures		
	and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
33 а	If manual or combination selected, specify what type of transactions are monitored manually	all transactions are monitored automatically, additional ex-post control of transactions >50k EUR on a daily basis.	of
34	Does the Entity have regulat ory requirements to report suspicious transactions?	Yes	lacksquare
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	•
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
7. PAYMI	ENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	•
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	
37 b	Local Regulations	Yes	
37 b1	If Y, Specify the regulation	ZaDiG	
37 с	If N, explain		
8. SANC	   FIONS		
38	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 foreign financial institutions?	Yes	•
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 stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes	•

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 tran	
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 tran	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering trar	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering trar	
41 e	Lists maintained by other G7 member countries	Not used	
41 f	Other (specify)	Austrian Lists if applicable	
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 🔻	
9. TRAIN	ING & EDUCATION		
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 44 b	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence 2nd Line of Defence	Yes 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 T	
10. AUDI			
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	
Wolfsberg G	Signature Page  Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)  Kathrein Privatbank Aktiengesellschaft  (Financial Institution name)		
Miriam Kl I, understood declaration,	(Senior Com	pliance Manager- Second Line representative), certify that I have read and te and correct to my honest belief.	
\$	Signiert von: Miriam Antje Klenner		
ı	Datum: 02.08.2023 17;19:31		
	Dieses Dokument ist digital signiert  Dieses mit leiner qualifizerten elektronischen Singatur wersehene Dokument hat gemäß Art. 25 Abs. 2 der Verordnung (EU) Nr 910/2014 vorm 23.  Abs. 2 der Verordnung (EU) Nr 910/2014 vorm 23.  wie ein handschriftlich unterschriebenes Dokument.		
	Prüfinformation: Informationen zur Prüfung der elektronischen Signatur finden Sie unter: www.a-trust.at/pdf		