

Financial Institution Name: Location (Country) :

Addiko Bank AG Austria

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.

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No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
		Addition Ports A.C.
		Addiko Bank AG
2	Append a list of foreign branches which are covered by	
_	this questionnaire	
		n.a.
	E III 1/D : () A I I	
3	Full Legal (Registered) Address	
		Canettistraße 5/12. OG, 1100 Wien
		Cancing that Co. 17. Co., 1700 William
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
5	Date of Entity incorporation/establishment	
		Registration in Company Register as of 07.09.2010 as limited liability company, Transformation into a Stock
		Company as of 04.07.2013, Banking Licence as of 01.09.2014
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
		Vienna Stock Exchange AT000ADDIKOO https://www.addiko.com/shareholder-structure/
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
• • • • • • • • • • • • • • • • • • • •	beneficial owners with a holding of 10% or more	
	0/ -546 - 5-464 - 4-4-1 -6	
7	% of the Entity's total shares composed of bearer shares	
		100%
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	140
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	Voc.
	services only through online channels?	yes
10	Name of primary financial regulator/supervisory authority	
		Austrian Financial Market Authority (Finanzmartaufsicht) European Central Bank , from 07.October 2020
11	Provide Legal Entity Identifier (LEI) if available	
• •	1 10 100 Legal Entity Identified (LEI) II available	
		529900UKZBMDBDZIXD62
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	No shareholder holds more than 25% of the total shares. Please find the current shareholder structure of Addiko
		Bank AG on its website https://www.addiko.com/shareholder-structure/
13	Jurisdiction of licensing authority and regulator of ultimate	
-	parent	
		n.a.
44	Coloret the huminoon areas or all the test - Furth	
14	Select the business areas applicable to the Entity	No
<u>14 a</u>	Retail Banking	No

14 b	Private Banking	No
14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
	Broker/Dealer	No No
14 h		
14 i	Multilateral Development Bank	No .
14 j	Wealth Management	No
14 k	Other (please explain)	Addiko Bank AG is mainly the holding company for subsidiaries in CSEE and operatively just active in 1) online deposit business in Austria and Germany and 2) investment of own liquid assets and derivative agreements to hedge respective business activities.
15	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 customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Greater than \$500 million
	are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2 PRODU	CTS & SERVICES	
19	Does the Entity offer the following products and services:	
40	Common dest Position	
<u>19 a</u>	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	No
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No
19 a1h3	PSPs	No
. J G I I I J	1 1010	ino .

19 a1i	Does the Entity have processes and procedures in	
13 411		No.
	place to identify downstream relationships with	No
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
		NO CONTRACTOR OF THE PROPERTY
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
		No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
	eCommerce Platforms	No
19 i4		NO .
19 i5	Other - Please explain	
	·	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
_		
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
•	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2		No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
13 04		
19 p4a	If yes, state the applicable level of due diligence	
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	I 0 A	No.
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o 23	Transaction Monitoring How many full time employees are in the Entity's AML,	Yes
23	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	
05	Question 29.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	100
26	Does the Entity use third parties to carry out any	.,
	components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	
		Customer Identification process provided by Raisin Bank, Frankfurt/Main, and Deutsche Bank for German online- deposit customers and Allgemeines Rechenzentrum, Innsbruck, for Austrian online deposit customers.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
4. ANTI DI	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
-	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	100
24	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	V
	levels of experience/expertise to implement the ABC	Yes
34	programme? Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
34 35	Does the Entity have a global ABC policy that:	,
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
35 b	advantage Includes enhanced requirements regarding interaction	
วอ ม	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	No
	other policy applicable to the Legal Entity)?	No
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	100
37	Does the Board receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	V
	(EWRA) been completed in the last 12 months?	Yes
20	If N provide the detection of the control	
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
20	Dogs the Entity have an ABC assistant 1.1.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the	No
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and other	Yes
40 b	third-party providers as appropriate Corruption risks associated with the countries and	
+v D	Corruption risks associated with the countries and industries in which the Entity does business, directly	Yes
_	or through intermediaries	<u> </u>
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
45 :	public officials	
40 d	Corruption risks associated with gifts and hospitality,	Ves
	hiring/internships, charitable donations and political contributions	Yes
	CONTRIBUTION	l

40 e	Changes in business activities that may materially	
40 e	increase the Entity's corruption risk	Yes
41	Does the Entity's entroption risk Thing search plant and the Entity's entroption or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	ABC is embedded in Compliance Policy as well as into related processes and procedures. Ad 35c) The code of conduct, the compliance policy and the certificate of compliance do not explicitly, but implicitly, prohibit falsification of books or records. Such behavior has legal and labour law consequences.
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 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
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

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57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 c 55 f 55 f 55 f 56 a 57 a 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 f 56 a 57 a 57 a 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 6 55 6 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 6 55 6 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
58 b Governance Yes 58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 c 55 f 55 a 55 f 55 c 55 f 55 c 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
58 c List Management Yes	54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 c 55 f 55 a 55 f 55 c 55 f 55 c 55 f 55 f 55 f 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 f 55 f 55 f 55 f 55 f 57 a 57 a 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 c 55 d 55 c 55 f 56 a 57 a 57 a 57 a 57 c 57 d 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
58 d Management Information Yes	54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 c 55 d 55 e 55 f 55 a 55 f 55 d 55 c 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes

	T •	I
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
39 a	was completed.	
	nas completour	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
00 a	and the branch/es that this applies to.	
	and the braner, so that the applies to:	
64	If appropriate, provide any additional information/context	
61	to the answers in this section.	
	to the answers in this section.	Ad 55 e) Name screening against adverse media is done manually just during EDD or in case of any indication by
		using WorldCheck or Google.
	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	Vec
	CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain	
J-7	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified: Ultimate beneficial ownership	Vea
65 a	Are ultimate beneficial owners verified?	Yes
65 a1 65 b	Authorised signatories (where applicable)	Yes Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	
	to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	1.00
67 a	If Y, what factors/criteria are used to determine the	
67.54	customer's risk classification? Select all that apply:	Yes
67 a1 67 a2	Product Usage Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Duration of business relationship
68	For high risk non-individual customers, is a site visit a	
	part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	hi .
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
		Addiko Bank AG has only individual clients
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
60.5	If V in this at:	
69 a	If Y, is this at: Onboarding	Yes
69 a1 69 a2	KYC renewal	Yes
03 az	ICT O TOTIOWAI	100

00.0		
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Manual
74	Adverse Media/Negative News?	
71	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
	they are rers, or controlled by rers:	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	
		Automated
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
	In IO/O	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	No
74 a3	3 – 4 years	No
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current	
		No
76	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?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
76 c	Correspondent Banking Principles 2022? Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Do not have this category of customer or industry
76 a	Marijuana-related Entities	IDO NOT NAVE THIS CATEGORY OF CUSTOMER OF INQUSTRY
76 g 76 h	Marijuana-related Entities MSB/MVTS customers	Do not have this category of customer or industry Do not have this category of customer or industry
76 h	Marijuana-related Entities MSB/MVTS customers Non-account customers	Do not have this category of customer or industry
	MSB/MVTS customers	
76 h 76 i	MSB/MVTS customers Non-account customers	Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 n 76 o 76 p 76 q	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on thave this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on tisk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 c	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated Charities Used Car Dealers	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on tisk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 c	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry EDD on thave this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w 76 x	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 v 76 w 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites and restricted industries for Addiko's subsidiaries in CSEE.
76 h 76 i 76 i 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v 76 y 76 y	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on tisk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites and restricted indusitries for Addiko's subsidiaries in CSEE.
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 s 76 t 76 w 76 v 76 w	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry As Addiko Bank AG is just providing online deposit servivces to private individuals none of above mentioned industries are relevant for the busines model.Nevertheless Addiko's Group AML/CFT Policy regulates prohibites and restricted industries for Addiko's subsidiaries in CSEE.

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	
	, , ,	No
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	
00	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
02	to the answers in this section.	
	to the answers in this section.	Addiko Bank AG is just providing online deposit services to private individuals and executes Group Steering
		activities
8. MONITO	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
	transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	Vendor-sourced tools
	system or vendor-sourced tools used?	Veridor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	CMADACD
		SMARAGD
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	
04 03	application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	
	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	Vee
	Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send	
03	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	·
90	Confirm that all responses provided in the above Section	W.
	are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
91	If appropriate, provide any additional information/context	
٥.	to the answers in this section.	
	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Yes
	Transparency Standards?	

93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
	compliance with:	
93 a	FATF Recommendation 16	Yes
	Local Regulations	Yes
93 b		Tes .
93 b1	If Y, specify the regulation	
		EU Regulation 2015/847
93 c	If N, explain	
	,	
	December Festis, because and the consensation of	
94	Does the Entity have controls to support the inclusion of	l.
	required and accurate originator information in cross	Yes
	border payment messages?	
95	Does the Entity have controls to support the inclusion of	
	required beneficiary information cross-border payment	Yes
	messages?	
05 -	If Y, does the Entity have procedures to include	
95 a		V
	beneficiary address including country in cross border	Yes
	payments?	
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	res
96 a	If N, clarify which questions the difference/s relate to	
55 a	and the branch/es that this applies to.	
	and the pranctives that this applies to.	
	Management and the second seco	
97	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Addiko Bank AG does not provide any payment service to customers.
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
90		
	management regarding compliance with sanctions law	
	applicable to the Entity, including with respect to its	Yes
	business conducted with, or through accounts held at	
	foreign financial institutions?	
	<u> </u>	
99	Does the Entity have policies, procedures, or other	
	controls reasonably designed to prevent the use of	
	another entity's accounts or services in a manner causing	
		Yes
	the other entity to violate sanctions prohibitions applicable	
	to the other entity (including prohibitions within the other	
	entity's local jurisdiction)?	
100	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	Yes
	sanctions relevant information in cross border	
	transactions?	
101	December 5-site and the contract of the contra	
101	Does the Entity screen its customers, including beneficial	
	ownership information collected by the Entity, during	Yes
	onboarding and regularly thereafter against Sanctions	
	Lists?	
102	What is the method used by the Entity for sanctions	
	screening?	Automated
102 c	If 'automated' or 'both automated and manual'	
102 a		
400 : 4	selected:	Vender remark to the
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected,	
	what is the name of the vendor/tool?	
		SMARAGD
102 a2	When did you last test the effectiveness (of finding	
	true matches) and completeness (lack of missing	< 1 year
	data) of the matching configuration of the	
	automated tool? (If 'Other' please explain in	
103	Does the Entity screen all sanctions relevant data,	
	including at a minimum, entity and location information,	l.
	contained in cross border transactions against Sanctions	Yes
	ů .	
	Lists?	
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to sanctions screening?	
106	Select the Sanctions Lists used by the Entity in its	
100		
100	sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
	Sanctions List (UN)	5555 15. 55.55
106 b	United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106.6	Office of Financial Sanctions Implementation HMT	
106 c		Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	The state of the s

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	1101 0000
107	When regulatory authorities make updates to their	
107	Sanctions list, how many business days before the entity	
	updates their active manual and/or automated screening	
	systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches,	
	subsidiaries, or representative offices located in	
		No
	G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	· · · ·
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context	
	to the answers in this section.	No subsidiarios in a sounts referring to a Comprehensive Constitute Program
		No subsidiaries in a country referring to a Comprehensive Sanctions Program
11. TRAININ	NG & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	Yes
111 b	government authorities Examples of different forms of money laundering,	
1110	terrorist financing and sanctions violations relevant for	Yes
	the types of products and services offered	
111 c	Internal policies for controlling money laundering,	Yes
·	terrorist financing and sanctions violations	res
111 d	New issues that occur in the market, e.g. significant	Yes
	regulatory actions or new regulations	
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to : Board and Senior Committee Management	Yes
112 a 112 b	1st Line of Defence	Yes
112 D	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 u		100
	I lining parties to which specific ECC activities have	L.
1120	Third parties to which specific FCC activities have been outsourced	Yes
112 f		Yes No
-	been outsourced	
112 f	been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	No No
112 f	been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training	
112 f	been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	No No
112 f	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?	No Yes
112 f 113	been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	No No
112 f 113	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,	No Yes
112 f 113	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?	No Yes

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	Tes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchies that this applies to.	
120	If appropriate, provide any additional information/context	
120	to the answers in this section.	
13. AUDIT		
121	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,	Yes
	Fraud and Sanctions policies and practices on a regular	
122	basis? How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	v
	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h 123 i	Technology Transaction Monitoring	Yes Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
124	tracked to completion and assessed for adequacy and	Yes
	completeness?	••
125	Confirm that all responses provided in the above section	Yes
125 a	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.	
		l l
	·	
126	If appropriate, provide any additional information/context	
126	·	
126	If appropriate, provide any additional information/context	
	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU	If appropriate, provide any additional information/context to the answers in this section.	
	If appropriate, provide any additional information/context to the answers in this section.	Yes
14. FRAU	If appropriate, provide any additional information/context to the answers in this section. Does the Entity have policies in place addressing fraud	Yes Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
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Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

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)

Addiko Bank AG

1 hm

___ (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 legal 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 standards.

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 this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, _____Ingrid Rappold Mellitzer, Director of Group Treasury and ALM 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.

I, ______Jozefipa Troavska, Director of Group Compliance and AML certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to pay nonest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

__ (Signature & Date) In Vienna, on 2 March 2023

_ (Signature & Date) In Vienna, on 2 March 2023