

Anti-Money Laundering and Counter Financing of Terrorism Policy Statement

A. Basic Information

Our full legal name and address

Kreissparkasse Biberach Zeppelinring 27-29 88400 Biberach Germany

phone: 49 7351 570 2419, fax 49 7351 570 2361

mail to: internationales@ksk-bc.de

BIC/SWIFT: SBCR DE 66

web: www.ksk-bc.de, short version in English: www.ksk-bc.de/internationales

member of the Sparkassenverband Baden-Württemberg

Type of business and activity

We are a savings bank and a leading regional bank for private customers and especially for medium-sized companies in the district of Biberach.

Board of Managing Directors

Martin Bücher (Chairman) Kurt Hardt Dr. Michael Schieble

Not any member of the board is a Politically Exposed Person (PEP).

Shareholder

Kreissparkasse Biberach is $100\,\%$ owned by the District of Biberach (state owned). We are incorporated under public law.

Name of our regulator, registration number

Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), Berlin – registration no. ID 100446-Graurheindorfer Str. 108, D-53117 Bonn / Germany

Accountant

Sparkassenverband Baden-Württemberg Am Hauptbahnhof 2, D-70173 Stuttgart / Germany

B. Legal Framework, Corporate Governance

Our country established laws designed to prevent money laundering and terrorist financing and our institution is subject to such laws. Our institution established written policies designed to combat money laundering and terrorist financing, including to obtain information about the true identity of our customers. The policy is applicable to the headquarter and all branches.



Our AML-Policy is also based on

- Guidelines issued by the FATF (Germany is a FATF member country)
- "Directive of the Council of the European Communities on the use of the financial system for the purpose of money laundering" (Directive 2005/60/EC of the European Parliament and the Council of 26 October 2005)
- The "German Money Laundering Act" (Geldwäschegesetz)
- Relevant guidelines issued by the Federal Banking Supervisory Office ("Bundesanstalt für Finanzdienstleistungsaufsicht") as banking supervision authority in Germany
- German Banking Act (Kreditwesengesetz)

C. Through Accounts, branches or subsidiaries abroad

We don't allow direct use of our correspondent accounts by third parties to transact business on their behalf (i.e. payable-through accounts).

We do not maintain any foreign branches or subsidiaries.

D. General Standards

General AML Policies, Practices and Procedures

Risk Assessment

Know Your Customer, Due Diligence and Enhanced Due Diligence

Reportable Transactions and Prevention and Detection of Transactions with illegally Obtained Funds

Transaction Monitoring

AML Training

Chief Anti-Money-Laundering:

Mrs. Uta Welser, mail to: uta.welser@ksk-bc.de

Date and Signature: 1st July 2018

Tobias Rommel

Head of International Department

Wolfgang/Jerg

Correspondent Banking