

Bank Information

Name of institution

Stadtsparkasse München

Address of institution

Sparkassenstr. 2, 80331 Munich, Germany

Principal places of business

City of Munich

We engage in the following major activities or provide the following services

Savings bank, universal and regional bank; commercial, private, mortgage and retail banking

Are we a publicly traded company?

No

Major shareholder

City of Munich (100%)

Board of Directors

Chairman:

Mr. Ralf Fleischer

Managing Directors:

Ms. Marlies Mirbeth

Dr. Bernd Hochberger

Mr. Stefan Hattenkofer

Does our institution have branches?

Yes

Does this questionnaire apply to our head office as well as to our branches?

Yes

Regulatory Authority

Name of our regulatory body

Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)

Graurheindorfer Str. 108

53117 Bonn

Germany

BaFin registration no. of Stadtsparkasse München: 100607

Governing Laws

Is our institution subject to laws and regulations preventing money laundering and the financing of terrorism?

Yes

The most important laws and regulations in this respect are

Geldwäschegesetz (GwG) (German Anti-Money Laundering Act)

Kreditwesengesetz (KWG) (German Banking Act)

EU-regulations

Auslegungs- und Anwendungshinweise des Zentralen Kreditausschusses

Is our institution required to report suspicious transactions to a central agency?

Yes

AML Management Details

Is there a compliance office set up for and a compliance officer in charge of supervising and coordinating efforts against money laundering and the financing of terrorism as well as monitoring compliance?

Yes

Principal AML Officer

Mr. Manfred Hartl

Compliance and AML Officer

80791 Munich, Germany

manfred.hartl@sskm.de

KYC Principles (Know-Your-Customer Program)

Has our institution implemented a know-your-customer program that is designed to obtain reliable and independent information to verify the true identity of our customers and does the know-your-customer program require enhanced due diligence for certain customers who may present a higher level of money laundering and/or terrorist financing risk?

Yes

Does our institution have policies covering relationships with politically exposed persons consistent with industry best practices?

Yes

Does our institution update our customer profile on a regular basis?

Yes

Does our institution have any anonymous accounts?

No

Operations

Has our institution established written policies designed to detect and prevent money laundering and terrorist financing?

Yes

Has our institution implemented a system or procedure for the monitoring and detection of suspicious transactions and for reporting this to a central agency?

Yes

Does our institution have employee training to teach employees about money laundering / terrorist financing / know your customer and to assist them in identifying suspicious activities?

Yes

Does our institution have any business activities with any shell banks?

No

Does our institution allow direct use of the correspondent account by third parties (payable-through account)?

No

Compliance Status

Does our institution have an established audit and compliance review function to test the adequacy of our AML/ Terrorist Financing policies and programs?

Yes

Does our institution presently comply with laws and our internal policy against money laundering and terrorist financing?

Yes

Has our institution been involved in any regulatory or criminal enforcement actions resulting from violations of laws or regulations against money laundering and terrorist financing in the past 5 years?

No