

Financial Institution Name: Location (Country) :

SECB Swiss Euro Clearing Bank GmbH GERMANY

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.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	SECB Swiss Euro Clearing Bank GmbH
2	Append a list of foreign branches which are covered by this questionnaire	No branches
3	Full Legal (Registered) Address	Nibelungenplatz 3, Frankfurt am Main, Germany
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	27. February 1998
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 c	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	100 % Six Group AG, Zürich
7	% of the Entity's total shares composed of bearer shares	n/a
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	BaFin (Federal Financial Supervisory Authority)
11	Provide Legal Entity Identifier (LEI) if available	529900YI7GR9R4L1UI63
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	SIX Group AG, Zurich
		<u> </u>

13	Jurisdiction of licensing authority and regulator of	FINMA (Swiss Financial Market Supervisory Authority)
	ultimate parent	FINMA (Swiss Financial Market Supervisory Authority)
14	Colort the husiness areas applicable to the Entity	
	Select the business areas applicable to the Entity	
14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	Yes
14 j	Wealth Management	
14 k	<u> </u>	No
14 K	Other (please explain)	SECB's business is the processing of cashless payments and clearing operations for banks and other financial institutions only, especially those domiciled in Switzerland (87,4%)
15	Does the Entity have a significant (10% or more)	
.0	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	Yes
1	resident in a different jurisdiction to the location	
İ	where bank services are provided)	
	· · ·	
15 a	If Y, provide the top five countries where the non-	Schweiz, Liechtenstein, Österreich, Luxemburg, Großbritannien
	resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	
		Greater than \$500 million
17	Confirm that all responses provided in the above	No branches
	Section are representative of all the LE's branches.	
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	
1.0	information/context to the answers in this section.	
	CTS & SERVICES	
19	Does the Entity offer the following products and	
L	services:	
19 a	Correspondent Banking	Yes
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
	services to domestic banks?	Yes
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	Vaa
	domestic banks?	Yes
40 - 4 1		
19 a1d	Does the Entity offer Correspondent Banking	Yes
	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	No.
	with foreign banks?	No
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	foreign banks?	1.55
10 212	· ·	
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
		No
	(MSBs)/Money Value Transfer Services (MVTSs)?	
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
13 0 1113	1013	INO

19 a1i		
	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	150
19 b	Cross-Border Bulk Cash Delivery	No
19 с	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No No
	•	
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
	,	11/0
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their	No
	customers?	
19 i1	If Y , please select all that apply below?	
19 i2		
	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
	,	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	
-	1 ()	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	ino .
19 b		
	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	Please select
19 p2	Wire transfers	
		No .
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers	
60	please provide more detail here, including	n/a
	describing the level of due diligence.	
	describing the level of due diligence.	
1		
19 a	Other high-risk products and services identified by	
19 q	Other high-risk products and services identified by	n/a
19 q	Other high-risk products and services identified by the Entity (please specify)	n/a
19 q		n/a
19 q		n/a
19 q	the Entity (please specify)	
	the Entity (please specify) Confirm that all responses provided in the above	n/a No branches
20	the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	
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20 20 a 21 3. AML, CT	the Entity (please specify) Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section.	
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20 20 a 21 3. AML, CT 22 22 a	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	No branches Yes
20 20 a 21 3. AML, CT 22 22 a 22 b	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	No branches Yes Yes
20 20 a 21 3. AML, CT 22 22 a	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	No branches Yes
20 20 a 21 3. AML, CT 22 22 a 22 b 22 c	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	No branches Yes Yes Yes Yes Yes
20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	No branches Yes Yes Yes Yes Not applicable
20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	No branches Yes Yes Yes Yes Not applicable Yes
20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f	Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	No branches Yes Yes Yes Yes Yes Yes Yes Not applicable Yes Yes
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20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	the Entity (please specify) Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	No branches Yes Yes Yes Yes Yes Yes Yes
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	the Entity (please specify) Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	No branches Yes Yes Yes Yes Yes Yes Yes
20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	the Entity (please specify) Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j 22 k	the Entity (please specify) Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	No branches Yes Yes Yes Yes Yes Yes Yes
20 20 a 21 21 3. AML, CT 22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	the Entity (please specify) Confirm that all responses provided in the above Section 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. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	No branches Yes Yes Yes Yes Yes Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 m	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, 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 Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
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	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
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 coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
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 improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function 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)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
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.	
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?	Please select
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 с	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 e 49 f		Yes Yes
	services to shell banks Prohibit opening and keeping of accounts for	

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
C AMI CT	S CANCTIONS DISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d 55	Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d 55 e	Transaction Screening	Yes
	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g 55 h	Governance	Yes
56	Managament Information	V
l	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes
56 a	Has the Entity's AML & CTF EWRA been completed	
56 a	Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	
57 57 a	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 Yes
57 57 a 57 b	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 Yes Yes Yes
57 57 a 57 b 57 c	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 Yes Yes Yes Yes
57 a 57 b 57 c 57 d	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 Yes Yes Yes
57 57 a 57 b 57 c	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 Yes Yes Yes Yes
57 a 57 a 57 b 57 c 57 d 58 58 a	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 Yes Yes Yes Yes
57 a 57 a 57 b 57 c 57 d 58 58 a 58 b	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 Yes Yes Yes Yes Yes Yes Yes
57 a 57 a 57 b 57 c 57 d 58 58 a	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 Yes Yes Yes Yes Yes Yes Yes

See Name Screening Yes See Training and Education Yes See Training and Education Yes See Training and Education Yes See See Early Spanicons EVRA been completed in Yes See See Early Spanicons EVRA been completed in Yes Section are representative of all the LE's branches Courtem Plant all responses provided in the above Section are representative of all the LE's branches Section are representative of all the LE's branches Section are representative of all the LE's branches If I appropriate provide any additional information to the transplose to the transplose to the transplose to the transplose to If I appropriate provide any additional information (context) I appropriate provide and provide any additional information (context) I appropriate Vers I appropriate Vers I appropriate Vers Vers I a Context Vers Vers Vers I a Purpose and nature of relationship Vers I a Purpose and natu			
Section Sect		-	Yes
Hose the Entity's Sanctions EVMRA been completed in the lest of months? Yes	58 f		Yes
the last 12 months? Sa a ENFA was completed. EVRA was completed. EVRA was completed. Confirm that all responses provided in the above Section are appresentative of all the LE b branches Section are appresentative of all the LE b branches Final Confirm that all responses provided in the above Section are appresentative of all the LE b branches Section are presentative of all the LE b branches and the branchise that this applies to and the branchise that this applies that the provided that the provi		· ·	Yes
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69 a1 Onboarding Yes		screening customers for Adverse Media/Negative News?	Yes
169 az KYC renewal Yes		· ·	
	69 a2	KYC renewal	Yes

	1	1
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
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?	
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?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
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	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Yes
74 ao	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
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	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Prohibited
76 d	Extractive industries	Prohibited
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	Prohibited
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Prohibited
76 i	Non-Government Organisations	Prohibited
76 k	· ·	
	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	Prohibited
76 n	PEP Class Associates	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	Prohibited
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Prohibited
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Prohibited
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	Prohibited
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Roth
76 a 79	Does the Entity have specific procedures for	Both
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No 🔻
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
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 to the answers in this section.	SECB's business is the processing of cashless payments and clearing operations for banks and other financial institutions only, especially those domiciled in Switzerland and Liechtenstein.
8. MONIT	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Siron AML
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring 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 reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
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 to the answers in this section.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes

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	Vaa
93 a 93 b		Yes
	Local Regulations	Yes
93 b1	If Y, specify the regulation	German Money Laundering Act, German Banking Act
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANO	CTIONS	
98	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
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 the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
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 sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
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?	Montran EFS
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
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 transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
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 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
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)	State Secretarial for Economic Affairs SECO, Switzerland
107	When regulatory authorities make updates to their 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 countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No 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.	
11 TRAININ	I NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Yes
112 d	Third parties to which specific FCC activities have been outsourced	Yes Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	11
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches

| If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. and the branch/es that this applies to. 116 If appropriate, provide any additional information/context to the answers in this section. 12. QUALITY ASSURANCE /COMPLIANCE TESTING 117 Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? 118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LE's branches 119 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 120 If appropriate, provide any additional information/context to the answers in this section. 13. AUDIT 13. AUDIT 141 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? 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 123 b External Third Party Yearly Yearly 123 b Enterprise Wide Risk Assessment Yes 123 C Governance 124 Governance 125 Governance 126 Governance 127 Yes 128 Covernance 128 Governance 129 Yes |
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| information/context to the answers in this section. 12. QUALITY ASSURANCE /COMPLIANCE TESTING 117 | Information/context to the answers in this section. 12. QUALITY ASSURANCE /COMPLIANCE TESTING 117 Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? 118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LE's branches 119 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 120 If appropriate, provide any additional information/context to the answers in this section. 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, Fraud and Sanctions policies and practices on a regular basis? 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 123 Letternal Third Party 124 Does the initernal audit function or other independent third party cover the following areas: 125 External Third Party 126 Vest 127 External Third Party 128 Does the initernal audit function or other independent third party cover the following areas: 129 Enterprise Wide Risk Assessment 129 Yes 120 Governance 120 Governance 121 Yes 122 Governance 122 Governance |
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| 117 Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? 118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LE's branches 119 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 120 If appropriate, provide any additional information/context to the answers in this section. 13. AUDIT 13. AUDIT 14 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, to 9th, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 123 a Internal Audit Department Yearly 123 Does the internal audit function or other independent third party, over the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? |
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| Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LE's branches 119 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 120 If appropriate, provide any additional information/context 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, Fraud and Sanctions programme by the following: 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 123 Internal Audit Department Yearly 124 Does the internal audit function or other independent third party cover the following areas: 125 AML, CTF, ABC, Fraud and Sanctions policy and 126 AML, CTF, ABC, Fraud and Sanctions policy and | Compliance Testing process (separate from the independent Audit function)? 119 Confirm that all responses provided in the above Section are representative of all the LE's branches 119 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 120 If appropriate, provide any additional information/context 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, Fraud and Sanctions policies and practices on a regular basis? 122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: 122 Internal Audit Department Yearly 123 Does the internal audit function or other independent third party over the following areas: 123 AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 Enterprise Wide Risk Assessment Yes 123 Governance Yes 123 KYC/CDD/EDD and underlying methodologies Yes |
| Section 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. If appropriate, provide any additional information/context to the answers in this section. 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? In worden is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: Internal Audit Department Yearly Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and AML, CTF, ABC, Fraud and Sanctions policy and | Section 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. If appropriate, provide any additional information/context to the answers in this section. Information/context to the answers in this section. 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? Internal Audit Department Yearly Internal Audit Department Yearly Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures AML, CTF, ABC, Fraud and Sanctions policy and procedures External Third Party Yearly Yes Section are representative of all the LE's branches No branches Pes Yes |
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| information/context to the answers in this section. 13. AUDIT 121 | information/context to the answers in this section. 13. AUDIT 121 |
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| l Voo | procedures 123 b Enterprise Wide Risk Assessment 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies Yes Yes Yes |
| procedures | 123 c Governance Yes 123 d KYC/CDD/EDD and underlying methodologies Yes |
| | 123 d KYC/CDD/EDD and underlying methodologies Yes |
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| 123 g Suspicious Activity Filing Yes | |
| 123 h Technology Yes | |
| 123 i Transaction Monitoring Yes | · · |
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| 123 k Training & Education Yes 123 l Other (specify) | · · · · · · · · · · · · · · · · · · · |
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| 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | tracked to completion and assessed for adequacy Yes |
| tracked to completion and assessed for adequacy Yes | tracked to completion and assessed for adequacy and completeness? Yes Confirm that all responses provided in the above |
| tracked to completion and assessed for adequacy and completeness? Yes Confirm that all responses provided in the above | tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to |
| tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to | tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional |
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| 123 I Other (specify) | 123 I Other (specify) |
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| Other (specify) | Other (specify) |
| 123 k Training & Education Yes | 123 k Training & Education Yes |
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| 123 f Reporting/Metrics & Management Information Yes | 123 f Reporting/Metrics & Management Information Yes |
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| 123 d KYC/CDD/EDD and underlying methodologies Yes | 123 e Name Screening & List Management Ves |
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| tracked to completion and assessed for adequacy and completeness? | tracked to completion and assessed for adequacy and completeness? |
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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	No branches
131 а	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.	
Declaration Statement		
<u>Declaration Statement</u>		
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)		
SECB Swiss Euro Clearing Bank GmbH (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, Dr. Franz Siener-Kirsch (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that		
the answers Institution.	s provided in this Wolfsberg CBDDQ are complete and correct to	o my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
I, Erdal Konak (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this		
Wolfsberg CBDDQ are complete and signed by my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
09.10.202	Franz Siuur-kirsu Signature & Dat	te)
09.10.202	DocuSigned by:	
	(Signature & Dat	te)