

KNOW YOUR CUSTOMER COMPLIANCE QUESTIONNAIRE



COMPANY PROFILE

1	NAME OF INSTITUTION	SECB Swiss Euro Clearing Bank GmbH, Frankfurt am Main
2	SWIFT BIC	SECGDEFF
3	Country of tax residence: Tax identification number: GIIN:	Germany Tax-number: 47 220 4314 9 VAT-number: DE197498153 GIIN: N8IQT4.00009.ME.276
4	Website Address	www.secb.de
5	Full address of the institution	Solmsstrasse 83 60486 Frankfurt Germany
6	Place of registration/business	Frankfurt am Main, Germany
7	Legal Status	GmbH (limited liability company)
8	Auditor	Ernst & Young GmbH Wirtschaftsprüfungsgesellschaft, Stuttgart
9	Shareholder's equity (December 31, 2020)	a) Subscribed capital: EUR 30.000.000,00 c) Revenue reserves cd) Other revenue reserves: EUR 65.900.000,00 d) Net profit EUR 12.865.615,77 <hr/> EUR 108.765.615,77
10	Listing Are your shares listed in any Stock Exchange Market(s)?	<input type="checkbox"/> Yes Name of Stock Exchange Market(s): Your stock symbol: <input checked="" type="checkbox"/> No
11	Primary regulatory body(ies) Please list names of the primary regulatory body (ies) that supervise(s) your institution.	Federal Financial Supervisory Authority (BaFin) Deutsche Bundesbank
12	Banking License	<input checked="" type="checkbox"/> Yes a) issued by: Federal Financial Supervisory Authority (BaFin) b) Banking license type: Full Banking License c) Year of issuance: 1998 d) Is your bank authorized to hold foreign currency accounts outside of your country? Only EURO Clearing e) Are there any restrictions on this authorization? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

		<p>f) Is your bank authorized to trade foreign exchange? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> not applicable as only EURO Clearing</p> <p>g) Bank's tax identification number (if any): VAT No. DE197498153</p> <p>h) Number of Domestic branches: none</p> <p>i) Number of Foreign branches: none</p>																					
13	Number of employees	31																					
14	Ratings	GBB-Rating: AA-																					
15	Main Business (e.g. Retail banking, Corporate banking, Investment banking etc.)	Clearing and Correspondent Banking																					
16	Executive Management Please list names and titles of Executive Management:	<table border="1"> <thead> <tr> <th>Name</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td>Hans-Joachim Michel</td> <td>Chief Executive Officer</td> </tr> <tr> <td>Ayşe Kun</td> <td>Chief Financial Officer</td> </tr> </tbody> </table>	Name	Title	Hans-Joachim Michel	Chief Executive Officer	Ayşe Kun	Chief Financial Officer															
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17	Main Shareholders Please list names of your principal Shareholders and percentage of ownership who own more than 25% shares of your bank.	<table border="1"> <thead> <tr> <th>Name</th> <th>Share (%)</th> </tr> </thead> <tbody> <tr> <td>SIX Group AG, Zurich</td> <td>100 %</td> </tr> </tbody> </table>	Name	Share (%)	SIX Group AG, Zurich	100 %																	
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18	<p>Identification of beneficial owners and clarification of their PEP status*</p> <p><input type="checkbox"/> The account/custody account holder holds at least one beneficial owner.</p> <p><input checked="" type="checkbox"/> The account/custody account holder has no de facto beneficial ownership, because the holding limits (capital share/voting rights) do not exceed the amount of 25 percent and another actual control is not recognizable. In this respect, according to the German Money Laundering Act, the so-called fictitious beneficial owner is to be listed. This pertains to the legal representative, the managing shareholder or partner of the contract partner.</p> <p>Does the (fictitious) beneficial owner or a close family member of the beneficial owner (direct relative or spouse) hold a prominent public function? <input type="checkbox"/> No <input type="checkbox"/> Yes</p> <table border="1"> <thead> <tr> <th>Last and first name of the beneficial owner</th> <th>Date of birth</th> <th>Place and country of birth</th> <th>citizenship</th> <th>Address</th> <th>PEP Status</th> <th>Capital Share or voting rights</th> </tr> </thead> <tbody> <tr> <td>Michel Hans-Joachim</td> <td>28.03.1963</td> <td>Wiesbaden, Germany</td> <td>German</td> <td>65193 Wiesbaden, Germany</td> <td><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</td> <td>_____% <input type="checkbox"/> direct <input type="checkbox"/> indirect</td> </tr> <tr> <td>Ayşe Kun</td> <td>13.08.1970</td> <td>Gelsenkirchen, Germany</td> <td>German</td> <td>65824 Schwalbach am Taunus, Germany</td> <td><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</td> <td>_____% <input type="checkbox"/> direct <input type="checkbox"/> indirect</td> </tr> </tbody> </table> <p><input type="checkbox"/> Explanations of the above-listed ownership and control structure through, for example, enclosed written explanations, shareholder lists, chart or group organizational chart.</p> <p>* Further information about the beneficial owners and their PEP status can be found on page 5.</p>		Last and first name of the beneficial owner	Date of birth	Place and country of birth	citizenship	Address	PEP Status	Capital Share or voting rights	Michel Hans-Joachim	28.03.1963	Wiesbaden, Germany	German	65193 Wiesbaden, Germany	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	_____% <input type="checkbox"/> direct <input type="checkbox"/> indirect	Ayşe Kun	13.08.1970	Gelsenkirchen, Germany	German	65824 Schwalbach am Taunus, Germany	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	_____% <input type="checkbox"/> direct <input type="checkbox"/> indirect
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19	FATCA (Foreign Account Tax Compliance Act) Is the bank or its beneficial owner domiciled in the USA or is a resident for tax purposes in the USA? With natural persons as beneficial owners: is this person taxable in the USA?	<p>Institution</p> <p><input type="checkbox"/> Yes</p> <table border="1"> <tr> <td>US Tax identification number and GIIN</td> <td></td> </tr> </table> <p><input checked="" type="checkbox"/> No</p>	US Tax identification number and GIIN																				
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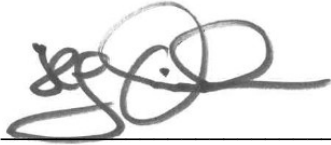
		<p>Beneficial Owner</p> <p><input type="checkbox"/> Yes</p> <table border="1"> <tr> <td>US Tax identification number and GIIN</td> <td></td> </tr> </table> <p><input checked="" type="checkbox"/> No</p>	US Tax identification number and GIIN	
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20	Affiliates, subsidiaries	none		
21	Financial products & services What type of financial products and services do your bank offer to your customers?	Processing of cashless payments and clearing operations for banks and other financial institutions, especially those domiciled in Switzerland and Liechtenstein.		
22	<p>Customers' Major Business segments Please describe your customers' major business segments. Do they include the following business?</p> <p>(* Casinos, Real estate agents, Dealers in precious metals and precious stones, Money Service Business, Lawyers, Notaries, Other independent legal professionals and accountants, Trust and service providers)</p>	<p><input type="checkbox"/> Yes (*) (* These segments afore mentioned occupy more than 25% shares in terms of customer portfolio of your institution.</p> <p><input checked="" type="checkbox"/> No SECB Swiss Euro Clearing Bank GmbH holds only accounts for banks and financial institutions. We do not hold any accounts for private customers.</p>		
23	<p>Specific laws and / or regulations covering AML Are there any specific laws and/or regulations in place covering Anti-Money Laundering?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>		
24	<p>Anonymous or numbered accounts Do the laws / regulations in your jurisdiction limit or prohibit opening or maintenance of anonymous or numbered accounts?</p>	<p><input checked="" type="checkbox"/> Yes (Limited or Prohibited)</p> <p><input type="checkbox"/> No (not Limited or Prohibited)</p>		
25	<p>Enforcement action Has your bank been fined or received any enforcement action by your regulator for a breach of Anti-Money Laundering legislation?</p>	<p><input type="checkbox"/> Yes Please attach details</p> <p><input checked="" type="checkbox"/> No</p>		
26	<p>Payable-through accounts* Does your bank allow direct use of your correspondent accounts by your customers to transact business on their behalf? I.e. Do you allow Payable-through accounts?</p>	<p><input type="checkbox"/> Yes</p> <p>a) Have you verified the identity of and performed on-going due diligence on your customers having direct access to your correspondent accounts? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b) Are you able to provide relevant customer identification data upon request? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>		

		<input checked="" type="checkbox"/> No
27	Does your bank facilitate transactions through the accounts held with the SECB involving a high risk third country** identified in accordance with the European Commission or a natural or juristic person resident in this third country?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> not applicable

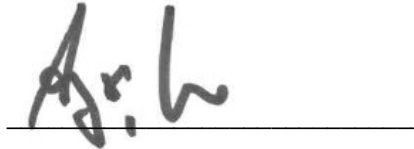
**Payable-through accounts : The above questions are based on Recommendation 13-(e) of FATF's "The Forty Recommendations". The background of the question is that "pass through account" is considered by the regulators as high risk for potential money laundering thus we need to verify that you have some kind of mechanism in place to reduce the risk of money laundering by asking you the additional questions a) & b).*

***High-risk third country identified by the European Commission in accordance with Article 9(2) of Directive (EU) 2015/849, as amended by Article 1(5) of Directive (EU) 2018/843; this shall not apply to branches of obliged entities established in the European Union as referred to in Article 2(1) of Directive (EU) 2015/849, as amended by point 1 of Article 1 of Directive (EU) 2018/843, and to majority-owned subsidiaries of such obliged entities which are located in a high-risk third country, provided that such branches and subsidiaries fully comply with the group-wide policies and procedures to be applied by them in accordance with Article 45(1) of Directive (EU) 2015/849.*

Name & Title:



Hans-Joachim Michel
Chief Executive Officer



Ayşe Kun
Chief Financial Officer

Date: September 2021



Information about the representative person, beneficial owner and regarding clarification of the PEP status

As a credit institution, SECB Swiss Euro Clearing Bank GmbH is obligated in the sense of the German Money Laundering Act to trace profits from serious criminal activities. This means that SECB Swiss Euro Clearing Bank GmbH is legally required to implement the duties of care contained in the German Money Laundering Act and to ensure adherence to them. In this regard, among other things, the identity of the person and their authorization to represent the contract partner is to be verified, and it is to be determined and recorded whether the beneficial owner, the contract partner or its beneficial owner is a politically exposed person (PEP).

Representative person

A (natural) person representing the contract partner pertains to a person who claims to act on behalf of the contract partner. To be recorded are persons acting as legal representation (e.g. authorized agent) as well as legal representatives.

Considered to be representative persons required to identify themselves are:

- Legally appointed representative in cases in which a business relationship is to be entered into (e.g. account opening) for the contract partner represented
- Legal representative in cases in which a business relationship is to be entered into (e.g. account opening) for the contract partner represented (e.g. member of an executive body, who actually act for legal entities.)

With regard to a person representing the contract partner, his or her authorization to do so is also to be verified.

Beneficial owner

The beneficial owner, in terms of the German Money Laundering Act is:

1. the natural person who ultimately owns or controls the contract partner, or
2. the natural person, upon whose initiative a transaction is ultimately executed or a business relationship is ultimately founded.

For corporations, the beneficial owners include those natural persons who directly or indirectly hold more than 25 percent of the capital shares, control more than 25 percent of the voting rights, or exercise control in a comparable manner.

If the company or its parent company (> 50%) is listed on a privileged stock exchange, the beneficial owners need not be clarified.

In the case of foundations and legal constructions with legal capacity which administer or distribute assets in a fiduciary capacity or entrust third parties with such administration or distribution, or comparable legal entities, the beneficial owners are:

- any natural person who acts as trustor (settler), administrator of trusts (trustee) or protector, if existing,
- any natural person who is a member of the supervisory board of the foundation,
- any natural person who has been determined to be a beneficiary,
- the group of natural persons, in favor of which the assets shall be administered or distributed, if the natural person who shall be beneficiary of the administered assets, has not yet been determined, and
- any natural person, who otherwise directly or indirectly exercises a controlling influence on the assets administration or profit distribution, and
- every natural person who can directly or indirectly exercise dominant influence on an association, who is a member of the executive board of the foundation or who has been designated as a beneficiary of the foundation.

In case of acting on initiative, counting among the beneficial owners are those on whose initiative the transaction will be executed. If the contract partner acts as a trustee, he is also acting upon the initiative of the beneficial owner.

Fictitious beneficial owners

If, after conducting comprehensive reviews, no natural person can be determined or if there is doubt that the person identified is the beneficial owner, then the legal representative, the managing shareholder or partner of the contract partner is considered to be the beneficial owner.

Politically exposed person

According to § 1, para. 12 of the German Money Laundering Act, a politically exposed person is someone who holds or has held a prominent public function on an international, European or national level, or a public office below the national level which is of comparable political significance. Politically exposed persons particularly include

1. heads of state, heads of government, ministers and deputy or assistant ministers;

2. members of parliament or of similar legislative bodies;
3. members of the governing bodies of political parties;
4. members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances;
5. members of courts of auditors;
6. members of the boards of central banks;
7. ambassadors, chargés d'affaires and high-ranking officers in the armed forces;
8. members of the administrative, management or supervisory bodies of state-owned enterprises;
9. directors, deputy directors and members of the board or equivalent function of an international organisation.

A person who has not exercised a prominent public function for at least one year in the sense of the aforementioned functions shall no longer be regarded as politically exposed.

A family member is an immediate family member, in particular

- spouses or registered partners,
- children and their spouses or registered partners,
- the parents.

A known closely associated person in terms of this act is a natural person for which there is reason to believe that he/she

1. together with a politically exposed person
 - a) is beneficial owner of an association according to § 20, para. 1 of the German Money Laundering Act, or
 - b) is beneficial owner of a legal construction according to § 21 of the German Money Laundering Act,
2. maintains close business relations with a politically exposed person, or
3. is sole beneficial owner of
 - a. an association according to § 20, para. 1 of the German Money Laundering Act, or
 - b. a legal construction according to § 21 of the German Money Laundering Act, for which there is reason to believe that the establishment is taking place de facto to the benefit of a politically exposed person.