the Wolfsberg Group

Financial Institution Name: Location (Country): Kathrein Privatbank Aktiengesellschaft Austria

No#	Question	American
	& OWNERSHIP	Answer
1	Full Legal name	Kathrein Privatbank Aktiengesellschaft
		Tradition Transaction Authorized States
2	Append a list of foreign branches which are covered	Kathrein Capital Management GmbH (subsidiary in Austria)
	by this questionnaire (if applicable)	
3	Full Legal (Registered) Address	
3	Full Legal (Registered) Address	Wipplingerstr. 25, 1010 Wien
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	08.05.1996
6	Select type of ownership and append an ownership	
ľ	chart if available	
6.0	Dublish Tandad (200) of shares sublish to ded	Al.
6 a 6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker	No The state of th
o a i	symbol	
6 b	Member Owned/Mutual	No 🖃
6 с	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	Raiffeisenbank International AG, please see OrgChart
	beneficial owners with a floiding of 10 % of filore	
7	% of the Entity's total shares composed of bearer	0
	shares	
8	Does the Entity, or any of its branches, operate under	No V
	an Offshore Banking License (OBL) ?	110
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	
ľ	provide services only through online channels?	No 🔻
10	Provide Legal Entity Identifier (LEI) if available	_
	FF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards	
	regarding the following components:	
44	,	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b		
11 c	Adverse Information Screening Beneficial Ownership	Yes Yes
11 d	Cash Reporting	Not Applicable
11 e	CDD	Yes
11 f	EDD	Yes
	•	

44	I	I	_
11 g	Independent Testing	Yes	
11 h	Periodic Review	Yes	
11 i	Policies and Procedures	Yes	
11 j	PEP Screening	Yes	M
11 k	Risk Assessment	Yes	
11 I	Sanctions	Yes	
11 m	Suspicious Activity Reporting	Yes	
11 n	Training and Education	Yes	
11 o	Transaction Monitoring	Yes	
12	Is the Entity's AML, CTF & Sanctions policy approved		一
10	at least annually by the Board or equivalent Senior Management Committee?	Yes	
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	
13 а	If Y, provide further details	RBI via Raiffeisen Service Center carries out the first voting of transaction screening	n
14	Does the entity have a whistleblower policy?	Yes	
	RIBERY & CORRUPTION		
15			
	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	•
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	•
17	Does the Entity provide mandatory ABC training to:		
17 a	Board and Senior Committee Management	Yes	
17 b	1st Line of Defence		
17 c	2nd Line of Defence	Yes	=
17 d	3rd Line of Defence	Yes	=
17 a 17 e		168	=
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes	
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes	
4. AML, CT	F & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
18 a	Money laundering	Yes	
18 b	Terrorist financing	Yes	
18 c	Sanctions violations	Yes	
19	Does the Entity have policies and procedures that:		
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	-
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	
19 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
19 d	Prohibit accounts/relationships with shell banks	Yes	
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	-
19 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	•
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	•
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative	Yes	-

similar document which defines a risk boundary around their business? 21 a Does the Entity have ancord returnion procedures that comply with applicable laws? 22 a If Y, what is the referition period? 5 years or more 6 years of the Entity perily the identity of the customer? 22 Does the Entity verily the identity of the customer? 23 Does the Entity perily the identity of the customer? 24 Does the Entity perily the identity of the customer? 25 Does the Entity perily the identity of the customer? 26 Does the Entity perily the identity of the customer? 27 Does the Entity perily the identity of the customer? 28 Does the Entity perily the identity gather and retain when conducting CDD? Select all that apply: 29 Does the Entity perily gather and retain when conducting CDD? Select all that apply: 20 Does the Entity perily gather and retain when conducting CDD? Select all that apply: 29 Does the Entity perily gather and retain when conducting CDD? Select all that apply: 20 Does the Entity perily perily gather and retain when conducting CDD? Select all that apply: 20 Does the Entity shoutcher 21 Does the Conducting CDD? Select all that apply: 22 Does the Entity shoutcher 23 Does the Gutty thanks a risk based approach to determine whether they are PEPs, or controlled by PEPs? 24 Does the Entity have pricise, procedures and processes to review and acceledate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 Does the Entity have periles, procedures and processes to review and acceledate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 26 Does the Entity have periles, procedures and processes to review and the Entity and the		<u> </u>		
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5. KYC, CDD and EDD 22 Does the Entity verify the identity of the customer? 23 Does the Entity verify the identity of the customer? 24 Which of the following does the Entity gather and very the customer of the customer	21		Yes	
5. KYO, CDD and EDD 22 Does the Entity verify the identity of the customer? 23 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of conboarding or within 30 days? 24 Which of the following loos the Entity gather and retain when conducting CDD? Select all that apply: 24 a Customer identification 24 b Expedied activity 24 c Nature of business/employment 25 e Yes 24 d Ownership structure 26 yes 27 e Product usage 28 yes 24 f Purpose and nature of ruistionship 26 yes 27 yes 28 J Yes 29 a J Wes 24 g Source of funds 25 a Avend of the following identified: 25 a Avend of the following identified: 25 a Avend of the following identified: 25 a J Wes and of the following identified: 25 a J Wes and of the following identified: 25 a J Wes and of the following identified: 25 a J Wes and of the following identified: 25 a J Wes and of the following identified: 25 a Wes and of the following identified: 26 Des the following identified: 27 Des the following identified: 28 b Authorised signatories (where applicable) Yes 29 a Wes 20 Des the following identified: 27 Does the Entity have a risk based approach to screening a risk classification? 28 Des the due diligence process result in customers receiving a risk classification? 29 a Wes 20 Des the Entity have policies, procedures and processes for review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PePs 29 a Wes 20 Des 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 29 a Wes 20 Des the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they ar	21 a	If Y, what is the retention period?		
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30 d Extractive industries Do not have this category of customer or industry 30 e Gambling customers Do not have this category of customer or industry 30 f General Trading Companies Do not have this category of customer or industry 30 g Marijuana-related Entities Do not have this category of customer or industry 30 h MSB/MVTS customers Do not have this category of customer or industry 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 b1	assessment contain the elements as set out in the	Yes	_
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30 e Gambling customers Do not have this category of customer or industry 30 f General Trading Companies Do not have this category of customer or industry 30 g Marijuana-related Entities Do not have this category of customer or industry 30 h MSB/MVTS customers Do not have this category of customer or industry 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 d	Extractive industries	Do not have this category of customer or industry	
30 f General Trading Companies Do not have this category of customer or industry 30 g Marijuana-related Entities Do not have this category of customer or industry 30 h MSB/MVTS customers Do not have this category of customer or industry 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 e	Gambling customers		
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30 j Non-Government Organisations EDD on risk-based approach				
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30 k Non-resident customers EDD on risk-based approach		·	1.1	
	30 k	Non-resident customers	EDD on risk-based approach	

30 I	Nuclear power	Do not have this category of customer or industry	
30 m	Payment Service Providers	Do not have this category of customer or industry	
30 n	PEPs	Always subject to EDD	
30 o	PEP Close Associates	Always subject to EDD	
30 p	PEP Related	Always subject to EDD	
30 q	Precious metals and stones	Do not have this category of customer or industry	
30 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry	
30 s	Regulated charities	EDD on risk-based approach	
30 t	Shell banks	Prohibited	
30 u	Travel and Tour Companies	Do not have this category of customer or industry	
30 v	·	Prohibited	=
30 W	Unregulated charities		
30 w	Used Car Dealers	Do not have this category of customer or industry	
	Virtual Asset Service Providers	Prohibited	M
30 y	Other (specify)		
31	If restricted, provide details of the restriction	according to our code of conduct and sensitive business policies https://www.rbinternational.com/en/raiffeisen/sustainability-esg/responsi anking/code-of-conduct.html	ble-b
6. MONI	TORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
33 a	If manual or combination selected, specify what type of transactions are monitored manually	all transactions are monitred automatically, additional ex-post control of transactions >50k EUR on a daily basis.	
34	Does the Entity have regulat ory requirements to report suspicious transactions?	Yes	
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	•
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
7. PAYM	ENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	
37 b	Local Regulations	Yes	
37 b1	If Y, Specify the regulation	FM-GwG (Finanzmarkt-Geldäwschergesetz) WiEReG (Wirtschaftlicher Eigentümer Registergesetz) BWG (Bankwesengesetz)	
37 с	If N, explain		
8. SANC	TIONS		
38	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	•
39	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	•

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes		
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	_		
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering tran		
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering traf		
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering trar		
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tran		
41 e	Lists maintained by other G7 member countries	Not used		
41 f	Other (specify)	Austrian Central Bank (ABC)		
42	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		
	IG & EDUCATION			
43	Does the Entity provide mandatory training, which includes:			
43 a	Identification and reporting of transactions to government authorities	Yes		
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes		
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes		
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes		
44	Is the above mandatory training provided to :			
44 a	Board and Senior Committee Management	Yes		
44 b	1st Line of Defence	Yes		
44 c 44 d	2nd Line of Defence 3rd Line of Defence	Yes Yes		
44 e	Third parties to which specific FCC activities have been outsourced	No 🔻		
44 f	Non-employed workers (contractors/consultants)	No 🔽		
10. AUDIT	Tron-employed workers (contractors/consultants)			
45	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?	Yes		
Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) Kathrein Privatbank Aktiengesellschaft				
(Financial Institution name) Miriam Klenner				
I, (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.				
	(Signature & Date)			