



ODDO BHF's duly completed AML-Questionnaire
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Name of correspondent bank (including legal form of the correspondent bank):

ODDO BHF Aktiengesellschaft

Head office address of the correspondent bank:

60302 Frankfurt, Germany

Correspondent bank information

1. **SWIFT/BIC:** BHFBDEFF

2. **Website:** <http://www.oddo-bhf.com/#!/home/de>

3. **Is your institution government-owned?**

Yes

No

4. **If applicable, how many branches do you have and in which countries are they located?**

13 branches located in Germany

5. **If applicable, how many subsidiaries do you have and in which countries are they located?**

Please see:

<http://www.oddo-bhf.com/#!/NosAgences/de>

6. **Which is your local supervisory authority (website if available)?**

www.bafin.de

7. **Please select the type of clients serviced by your institution:**

<input type="radio"/> Retail domestics	Yes	<u>No</u>
<input type="radio"/> Retail offshore	Yes	<u>No</u>
<input type="radio"/> Commercial domestics	<u>Yes</u>	No
<input type="radio"/> Commercial offshore	<u>Yes</u>	No
<input type="radio"/> Correspondent Banking	<u>Yes</u>	No
<input type="radio"/> Private Banking	<u>Yes</u>	No

8. **Please list the Board of Directors of your financial institution:**

Please see: <http://www.oddo-bhf.com/#!/management/de>

9. **Do any politically exposed persons (PEPs) have a controlling interest (e.g. owner) or executive management role in your institution?**

Yes

No

Anti-money laundering information
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10. Are there anti-money laundering regulations in your country?

Yes No

If yes, please state where these regulations may be found (website if available):

Act on the Detection of Proceeds from Serious Crimes (Money Laundering Act):

https://www.bafin.de/SharedDocs/Veroeffentlichungen/EN/Aufsichtsrecht/Gesetz/GwG_en.html

11. Does your institution have a designated AML officer?

Yes No

If yes, please provide the following:

Name

Michaela Lorenz

Title

Head of Compliance, AML, Embargo

E-mail

Michaela.Lorenz@oddo-bhf.com

12. Has your institution established written policies, procedures and controls designed to prevent and detect money laundering and terrorist financing activities?

Yes No

If yes, do your policies, procedures and controls specifically include:

- o thorough client identification (due diligence)

Yes No

- o a risk-based approach to 'know your customer' procedures

Yes No

- o retention of records of identification and due diligence in accordance with your local regulatory requirements

Yes No

If yes, for how long?

For 10 years

- o not maintaining anonymous accounts

Yes

No

- o a programme for monitoring suspicious or unusual activity

Yes

No

- o reporting suspicious activity to your local authorities

Yes

No

- o periodic AML training for your staff

Yes

No

If yes, who receives this training and how often?

All employees (exception: drivers, etc.) receive training when joining ODDO BHF and then every two years.

13. Do you ensure that your policies, procedures and controls are communicated and enforced effectively in your network of domestic and international offices?

Yes

No

14. In addition to inspections by the supervisor/regulator, do you have an internal audit function or other independent third party that assesses AML/CTF¹ procedures, policies and controls?

Yes

No

If yes, please explain:

Internal Audit division – every year
External Audit (PwC) – every year

¹ Combating terrorist financing

15. Does your financial institution open or operate "payable through accounts"²?

Yes No

16. Does your institution provide services to any of the following?

<input type="radio"/> Shell banks	Yes	<u>No</u>
<input type="radio"/> Internet banks	Yes	<u>No</u>
<input type="radio"/> Banks located in high-risk jurisdictions?	<u>Yes</u>	No
<input type="radio"/> Internet gambling	Yes	<u>No</u>
<input type="radio"/> Money transmitters	Yes	<u>No</u>

17. Have any regulatory or criminal enforcement actions resulting from violations of anti-money laundering and/or terrorist financing laws or regulations been opened against your institution in the past five years?

Yes No

² This type of account enables the customer to dispose over accounts opened in the name of the account-operating bank or in the name of a third-party bank as if they were the customer's own accounts.

We confirm with our signature that the above information is correct, particularly that we have no business relationships with shell banks and do not open or operate "payable through accounts".

ODDO BHF Aktiengesellschaft



Date: 22.05.2019