

# Anti Money Laundering Acknowledgement and Global Certification Regarding Foreign Correspondents Relationships (WELADE3S)

## Bank Information

Name of our institution:

- Kreissparkasse Steinfurt (BaFin-Registration no. 100865)

Administrative Details:

Place of incorporation:

- Ibbenbueren

Registered address:

- Bachstr. 14, 49477 Ibbenbueren, Germany

Principal Places of Business:

- following towns in the district Kreis Steinfurt: Altenberge, Greven, Hopsten, Horstmar, Hoerstel, Ibbenbueren, Kattenvenne, Ladbergen, Lienen, Lotte, Metelen, Mettingen, Neuenkirchen, Nordwalde, Recke, Saerbeck, Steinfurt, Tecklenburg, Westerkappeln, Wettringen

Is our institution publicly listed on a stock exchange?

- No

Members of our board of directors:

- Chairman: Rainer Langkamp
- Managing Director: Heinz-Bernd Buss

We engage in the following activities or provide these services:

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

## Governing Laws

Is our institution subject to laws and regulations against money laundering and terrorist financing?

- Yes

Our relevant laws and regulations are mainly:

- EU-Regulations
- Geldwäschegesetz (GWG)
- Kreditwesengesetz (KWG)
- Außenwirtschaftsgesetz (AWG)
- Wertpapierhandelsgesetz (WPHG)
- BaFin-Verlautbarungen

## Regulatory Authority

Is our institution subject to the supervision of any regulatory authority?

- Yes

Name of the authority:

- Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)  
Graurheindorfer Str. 108  
53117 Bonn  
Germany

Is our institution subject to a regularly supervision by an auditor?

- Yes

Name of the auditor:

- Prüfungsstelle des Westf.-Lippischen Sparkassen und Giroverbandes  
Regina-Protmann-Str. 1  
48159 Muenster  
Germany

Does our institution have a written policy against money laundering and terrorist financing?

- Yes

Is the policy up to FATF standards?

- Yes

Is the policy applicable to the headquarters, all branches and subsidiaries?

- Yes

Does our institution employ agents to carry out some of the functions of our institution and if so does our institution provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms money laundering involving our institution's products and services and internal policies to prevent money laundering?

- Yes

Name and address:

- Finanz Informatik GmbH & Co. KG  
Theodor-Heuss-Allee 90  
60486 Frankfurt am Main  
Germany

(100% subsidiary of German Savings Financial Group - Deutsche Sparkassen-Finanzgruppe)

We confirm that the policy and procedures have addressed the following issues:

Verification of the true identity of customer and beneficial owner using reliable, independent sources of documents, data or information

- Yes

Retention of all relevant documents and information in respect of customer identity and transactions according to the regulatory authority requirements:

- Yes

Mechanism to detect suspicious or abnormal transaction activities, and procedures for reporting them:

- Yes

Staff training program:

- Yes

Independent audit and/or compliance review function to test the adequacy of policy and procedures:

- Yes

## Operations

Does our institution maintain any correspondent institution relationship or conduct business with any shell bank?

- No

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

- No

Does our institution have any anonymous accounts?

- No

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

- Yes

### **Risk Management Details**

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

- Yes
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Name and contact details of the compliance officer

- Mrs. Dorothee Wirsching  
Compliance and Money Laundering Officer  
c/o Kreissparkasse Steinfurt  
Bachstr. 14  
49477 Ibbenbueren  
Germany

### **Compliance Status**

Does our institution presently comply with laws and its 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

### **General AML Policies, Practices and Procedures**

Is the AML compliance program approved by the Board of our institution?

- Yes

Does our institution have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?

- Yes

Has our institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?

- Yes

In addition to inspections by the government supervisors/regulators, does our institution client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?

- Yes

Does our institution have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)

- Yes

Does our institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?

- Yes

Does our institution have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?

- Yes

Does our institution have record retention procedures that comply with applicable law?

- Yes

Are our institution's AML policies and practices being applied to all branches and subsidiaries of our institution both in the home country and in locations outside of that jurisdiction?

- Yes

### **Risk Assessment**

Does our institution have a risk-based assessment of its customer base and their transactions?

- Yes

Does our institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that our institution has reason to believe pose a heightened risk of illicit activities at or through our institution?

- Yes

### **Know Your Customer, Due Diligence and Enhanced Due Diligence**

Has our institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?

- Yes

Does our institution have a requirement to collect information regarding its customers' business activities?

- Yes

Does our institution assess its customers' AML policies or practices?

- Yes

Does our institution have a process to review and, where appropriate, update customer information relating to high risk client information?

- Yes

Does our institution have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?

- Yes

Does our institution complete a risk-based assessment to understand the normal and expected transactions of its customers?

- Yes

### **Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds**

For the identification and reporting of transactions that are required to be reported to the authorities does our institution have policies or practices?

- Yes

Does our institution have procedures to identify transactions structured to avoid such obligations where cash transaction reporting is mandatory?

- not mandatory

Does our institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?

- Yes

Does our institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?

- Yes

### **Transaction Monitoring**

Does our institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?

- Yes

### **AML Training**

Does our institution provide AML training to relevant employees that includes:

-Identification and reporting of transactions that must be reported to government authorities.

-Examples of different forms of money laundering involving the products and services of our institution

-Internal policies to prevent money laundering.

- Yes

Does our institution retain records of its training sessions including attendance records and relevant training materials used?

- Yes

Does our institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?

- Yes

Does our institution employ third parties to carry out some of the functions of our institution?

- Yes

Does our institution provide AML training to relevant third parties, if the answer to question 26 is yes, that includes:

-Identification and reporting of transactions that must be reported to government authorities.

-Examples of different forms of money laundering involving products and services of our institution

-Internal policies to prevent money laundering.

- Yes

Ibbenbueren, 31th July 2018  
Kreissparkasse Steinfurt