

Anti-Money Laundering Acknowledgement

As at 01 December 2016

Section I – General Administrative Information

Legal Name:	Sparkasse Trier
Swift Address:	TRISDE55
Country of Your Licensing Authority & Regulator:	Germany
Legal Form:	Public sector Financial Institution under Public Law
Principal place of business:	Trier, Germany
Date established:	1825
Registered at:	Amtsgericht Wittlich, HRA 4475
Banking license:	III 110 (394) dd. 20.12.1994, Bundesaufsichtsamt für das Kreditwesen
Listed on:	Sparkasse Trier is not publicly listed on a stock exchange.
Website:	www.sparkasse-trier.de
Countries of branches:	Germany

Sparkasse Trier is a public owned savings bank working under public law. We have no foreign branches or subsidiaries. Furthermore we are subject to all well published laws and regulations as all banks in Germany. We have integrated these laws and regulations which we strictly follow.

Section II – Ownership & Management Information

Ownership details/ Shareholders:	We refer to our website www.sparkasse-trier.de
Members of the Board of Managing Directors:	We refer to our website www.sparkasse-trier.de
Members of the Super- visory Board:	We refer to our annual report on our website www.sparkasse-trier.de
Do you publish your latest Financial statement and Equal information?	Yes. You can find our annual report on www.sparkasse-trier.de
Do you publish your Director´s dealings?	No.
Does your institution have a Governance Codex?	Yes.

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Section III – Prevention of Money Laundering and Combating Terrorist Financing			
General AML/CTF Policies, Practices and Procedures		Yes	No
1.	Does the AML compliance program require approval of the FI's Board or a Senior Committee thereof?	X	
2.	Does the FI have a legal and regulatory compliance program that includes a designated compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	X	
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	X	
4.	In addition to the inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent 3 rd party that assesses AML policies and practices on a regular basis?	X	
5.	Does the FI 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.)?	X	
6.	Does the FI 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?	x	
7.	Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	X	
8.	Does the FI have appropriate record retention procedures pursuant to applicable laws?	X	
9.	Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	X	
Risk Assessment			
10.	Does the FI have a risk focused assessment of its customer base and transactions of its customers?	X	
11.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at our through the FI?	X	
Know Your Customer, Due Dilligence and Enhanced Due Dilligence			
12.	Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example, name, nationality, street address, telephone number, occupations, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?	X	
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	X	
14.	Does the FI collect information and assess its FI customer's AML policies and practices?	X	
15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	x	
16.	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer	x	

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	information collected at account opening?		
17.	Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	X	
Reportable Transactions and Prevention & Detection of Transactions with illegally Obtained Funds			
17.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to authorities?	X	
18.	Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	X	
19.	Does the FI screen transactions for customers or transactions the FI deems to be significantly high risk (which may include persons, entities, or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	X	
20.	Does the FI 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?	X	
21.	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess Licences to operate in their countries of origin?	X	
22.	Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT205/205COV message formats?	x	
Transaction Monitoring			
23.	Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers cheques, money orders, etc.)?	X	
AML Training			
24.	Does the FI provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	X	
25.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X	
26.	Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	
27.	Does the FI employ agents to carry some of the functions of the FI and if so does the FI provide AML training to the relevant agents that includes identification and reporting of transactions that must be reported to the government authorities, examples of different forms of money laundering involving the Bank's products or services, and internal policies to prevent money laundering?	X*	X*

* Ref. to question No. 27:

We do not provide AML training to the third parties because they are also subjected to the AML regulations and they have established separate AML officers as well as AML policies.