

Anti Money Laundering Questionnaire

1. General Corporate Information

1.1 Legal name		
	Portigon AG	
1.2 Legal Address		
	Völklinger Straße 4 40219 Duesseldorf Germany	
1.3 Legal form of company		
	Unlisted stock corporation (publicly owned)	
1.4 Date of Establishment		
	December 12 th , 1968	
1.5 Company Registration		
	HRB 42975 Amtsgericht Duesseldorf	Please state Registrating Authority and registration number if applicable.
1.6 Banking licence		
	Reg.No: 11614/68 Issued by "Bundesaufsichtsamt fuer das Kreditwesen" (BaKred), meanwhile „Bundesanstalt für Finanzdienstleistungsaufsicht“ (BaFin)	Please state the Issuing Date, the Issuing Authority and the number of your banking licence if applicable
1.7 Tax Identification No.		
	DE 11 93 79 25 4	If applicable, only
1.8 Is your Company publicly traded?		
	<input type="radio"/> Yes <input checked="" type="radio"/> No	Please list the exchanges where you are listed and the trading codes
1.9 Corporate Website		
	www.portigon-ag.de	Please state your corporate's internet address
1.10 Does your Company maintain physical presence in the place of your legal address?		
	<input checked="" type="radio"/> Yes <input type="radio"/> No	If NO, is your company a regulated affiliate of a Financial Institution with physical presence? <input type="radio"/> Yes* <input type="radio"/> No *Please state address

2. Ownership & Management Information		
2.1 Ownership details/ shareholders (owning directly or indirectly 25% or more)	<input checked="" type="checkbox"/> list of owners is attached (please refer to last page of this document!)	
2.2 Members of the Board of Directors / Main Executives	<input type="checkbox"/> list of Directors/Main Executives attached or <input checked="" type="checkbox"/> please refer to our website: www.portigon-ag.de	
2.3 Does a Supervising Board for your company exist?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2.4 Members of the Supervisory Board if applicable	<input type="checkbox"/> list of Members attached or <input checked="" type="checkbox"/> please refer to our website: www.portigon-ag.de	
2.5 Do you publish your latest financial statement and equal information?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> website: www.portigon-ag.de	Please state the source of information or attach the latest financial statement and equal information.
2.6 Do you publish your Director's dealings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> website:	Please state the source of information if applicable.
2.7 Does your institution have a Governance Codex?	<input checked="" type="checkbox"/> Yes (seperate document attached) <input type="checkbox"/> No <input type="checkbox"/> website:	Please state the source of information if applicable.
3. Prevention of Money Laundering and Combating Terrorist Financing		
3.1 General Requirements		
3.1.1 Is your company supervised by a national authority?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please state name and address of the supervisory authority: Bundesanstalt für Finanzdienstleistungsaufsicht Graurheindorfer Str. 108 D-53117 Bonn/Germany and Marie-Curie-Str. 24 - 28 D-60439 Frankfurt/ Germany
3.1.2 Is the supervision carried out with special regard to the prevention of money laundering and combating terrorist financing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3.1.3 Is money laundering considered as a crime in your legislation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3.1.4 Is terrorist financing considered as a crime in your legislation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

3.1.5 Does the country in which your head office is located adhere to the 40 AML-recommendations and the 9 special terrorist financing recommendations developed by the Financial Action Task Force (FATF)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.1.6 Are your foreign branches and subsidiaries subject to the AML laws and your internal policies and procedures applicable to your head office?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.1.7 Are you audited in terms of testing the adequacy of your anti-money laundering procedures and policies by internal audit on a regular basis?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.1.5 Are you audited in terms of testing the adequacy of your anti money laundering procedures and policies by external audit on a regular basis?	<input checked="" type="radio"/> Yes <u>External Auditor:</u> Ernst&Young <input type="radio"/> No

3.2 Internal Measures	
3.2.1 Has your company appointed a senior officer responsible for anti-money laundering arrangements?	<input checked="" type="radio"/> Yes <input type="radio"/> No
• Please state the contact details:	
○ full name	Alexander Schaaf; Sabine Hauschildt (Deputy)
○ address	Völklinger Straße 4 40219 Duesseldorf Germany
○ telephone	+49-211-826-6919
○ e-mail	<u>alexander.schaaf@portigon-ag.de</u> <u>sabine.hauschildt@portigon-ag.de</u>
3.2.2 Do you have account opening procedures (customer acceptance policy) in place?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.3 Do you require that all accounts bear the name of the owner?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.4 Do you send wire transfer or issue drafts on behalf of non-customers without obtaining proof of identification?	<input type="radio"/> Yes <input checked="" type="radio"/> No
3.2.5 Do you have internal measures/ policies for the prevention of money laundering and terrorist financing in place?	<input checked="" type="radio"/> Yes <input type="radio"/> No
• Is the compliance with the measures/ policies checked regularly by	
○ Internal Audit?	<input checked="" type="radio"/> Yes <input type="radio"/> No
○ External Audit?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.6 Do you have written anti-money laundering procedures and policies which include at least:	
• the identification of the true identity of all customers prior to establishing a business relationship?	<input checked="" type="radio"/> Yes <input type="radio"/> No
• the verification of beneficial owners of funds?	<input checked="" type="radio"/> Yes <input type="radio"/> No

<ul style="list-style-type: none"> • staff training in terms of AML which is carried out on a regular basis? 	<input checked="" type="radio"/> Yes <input type="radio"/> No
<ul style="list-style-type: none"> • an employee training program to educate employees in the ways of preventing money laundering transactions and to assist them in identifying suspicious transactions, which is carried out on a regular basis? 	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.7 Do your regulations/ directives require the recognition of the true identity of customers and the origin of their funds?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.8 Is your customer identification program designed to obtain and verify information regarding your customers true identity, source of funds, economic activities and the nature of anticipated transactional activities?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.9 Is your customer identification program designed on a risk approach requiring enhanced due diligence on the appropriate risk level for countries/ territories or special customer groups (e.g. PEPs)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.10 Do you monitor transactions and accounts in the name of suspected terrorists and/or terrorist organisations and report them to the competent authorities?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.11 Is your monitoring program designed to facilitate the identification of suspicious transactional activities?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.12 Do you have implemented a system that is designed to assess your compliance with international anti-money laundering and anti-terrorist financing policies, regulations and the relevant legislation?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.13 In relation to cross-border correspondent banking and other similar relationships, does your institution gather sufficient information about a respondent institution to understand their business, reputation, quality of supervision and regulatory history?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.14 With respect to these relationships, do you assess the correspondent's AML controls and are all new relationships approved by Senior Management?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.15 Do you require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses, account number and purpose?	<input checked="" type="radio"/> Yes <input type="radio"/> No
3.2.16 Has your company been subject to sanctions or punitive actions – related to Anti Money Laundering or Terrorist Financing – by a regular or law enforcement during the last 5 years? If yes, please provide a description of such sanction or action.	<input type="radio"/> Yes <input checked="" type="radio"/> No
3.2.17 Does your institution allow direct use of the correspondent account by your customers to transact business on their own behalf (e. g. payable through accounts)?	<input type="radio"/> Yes <input checked="" type="radio"/> No
3.2.18 Does your company maintain any correspondent banking relationships with Section 311 (USA PATRIOT Act) banks or banks situated in Iran or North Korea?	<input type="radio"/> Yes <input checked="" type="radio"/> No

4. Miscellaneous		
4.1 Has an USA PATRIOT Act Certification (as well for Correspondent banks) been provided by your company?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Please state the issuing date and the internet source if available: Pls find document attached
4.2 Has an USA PATRIOT Act Re-Certification (as well for Correspondent banks) been provided by your company?	<input type="radio"/> Yes <input checked="" type="radio"/> No	Please state the issuing date and the internet source if available:
4.3 Can you confirm that you do not provide any banking services to "shell" banks?	<input checked="" type="radio"/> Yes <input type="radio"/> No	A shell bank is generally defined as an entity that does not maintain a physical presence.

Ownership structure of Portigon AG

Name	Stake	Address
Land Nordrhein-Westfalen	69,49 %	Stadtter 1 D-40219 Düsseldorf
NRW. BANK	30,51 %	Kavalleriestr. 22 D-40213 Düsseldorf

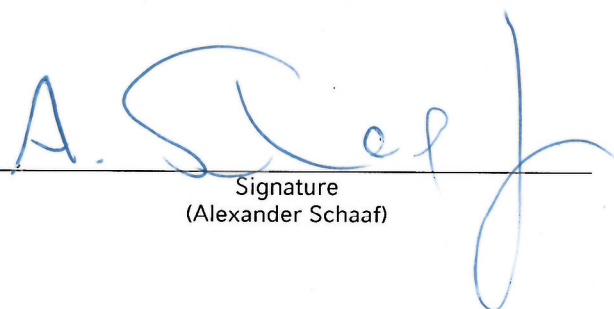
Please note:

If you have an Anti Money Laundering/Combating the Financing of Terrorism statement, please attach it to your response.

We hereby confirm that the statements given above are true and correct:

Duesseldorf, 30.05.2018

Place & Date



Signature
(Alexander Schaaf)