

## **FOREIGN FINANCIAL INSTITUTIONS** **ANTI-MONEY LAUNDERING QUESTIONNAIRE**

1. Name of Financial Institution:  
Steiermärkische Bank und Sparkassen Aktiengesellschaft
2. Legal Form  
Non listed Stock Company (registered shares with restricted transferability)
3. City/Country:  
Graz / Austria
4. Company facts:  
Details see at [www.steiermaerkische.com](http://www.steiermaerkische.com)
5. Areas covered by this questionnaire:  
Head Office & domestic branches
6. Name of the regulating body that oversees the Institution:  
Austrian Financial Market Authority (FMA)
7. License and registration number:  
Registered Seat Graz, Registration No. 34274, Commercial Court Graz  
Licensed Credit Institution in accordance with Article 1 Paragraph 1 of the Austrian  
Banking Act

### **I. FACTS RELATED TO REGULATORY ENVIRONMENT**

8. Austria has established laws designed to prevent money laundering and terrorist financing and our institution is subject to and fully compliant with these laws. The AML provisions to be fulfilled by Austrian banks are part of the Financial Markets Anti-Money Laundering Act (FM-GwG) For more details please visit [https://english.bmf.gv.at/financial-sector/Money-Laundering-and-Terrorist-Financing.html#Legal\\_bases\\_in\\_Austria](https://english.bmf.gv.at/financial-sector/Money-Laundering-and-Terrorist-Financing.html#Legal_bases_in_Austria)
9. The laws and regulations in our country prohibit our institution from opening anonymous accounts.
10. Our institution is required to report suspicious transactions/activities to a central agency (FIU).
11. Our national/international branches and subsidiaries engaged in banking or non-banking financial activities are subject to our AML policies.

### **II. FACTS RELATED TO OUR INSTITUTION'S AML POLICIES AND PRACTICES**

12. Our institution has a written policy and controls and procedures reasonably designed to prevent and detect money laundering/terrorist financing activities.
13. We have a primary AML Compliance Officer who is responsible for Anti-Money-Laundering (AML) and "Know Your Customer" (KYC) compliance.
14. Name and contact information of the officer responsible for our institution's AML program:

Name: Sebastian Liehl  
 Title: Head of Compliance  
 Telephone number: +43 (0)5 0100 - 35035  
 Email address: [aml@steiermaerkische.at](mailto:aml@steiermaerkische.at)

15. Our institution's AML policy and program include the following:
- 15.1. Established audit and compliance review function to test the adequacy of our Anti Money-Laundering/Terrorist Financing policies and programs.
  - 15.2. Policy and procedures for independent audit or testing of the AML compliance program. These audits are conducted at least once a year.
  - 15.3. Customer identification requirements at the inception of the relationship in order to obtain information about our customers that relate to money laundering risk, including name, address, type of business and anticipated nature of transactions between the customer and our financial institution.
  - 15.4. A KYC program that is designed to obtain reliable and independent information to verify the true identity of our customers.
  - 15.5. The KYC program requires enhanced Due Diligence to be undertaken for certain customers that may present a higher level of Money Laundering and/or Terrorist Financing risk.
  - 15.6. Our Institution has an embargo/sanction monitoring in place that maintains lists of EU, UN and OFAC of individuals/entities ("control lists"), to whom/which we are prohibited from providing financial services or with whom/which we are prohibited from conducting financial transactions.
  - 15.7. Our Institution screens the customer database and transactions for customers against these control lists to ensure we do not provide financial services to, or conduct business transactions with, these individuals/entities.
  - 15.8. We do not allow third parties to directly or indirectly use our account(s) with any bank, i.e. in the form of "payable through" accounts.
  - 15.9. We have customer identification requirements in place for transactions with non-established customers or walk – ins.
  - 15.10. There are established clearly defined roles, responsibilities and accountabilities as they relate to anti-money laundering compliance
  - 15.11. Periodic AML Training Programs to deliver information to your employees who would reasonably be expected to encounter potentially suspicious activity:
    - 15.11.1. Employees participating in regularly organized AML training;
    - 15.11.2. Every new employee after starting working with us;
    - 15.11.3. Every sales officer at least once a year;
    - 15.11.4. Sales officers and other officers: we organize several additional AML/CFT seminars every year;
    - 15.11.5. AML officer at least once a year.
  - 15.12. Our institution complies with local suspicious activity reporting requirements.
  - 15.13. Procedures to monitor large cash deposits and withdrawals
  - 15.14. We retain records of documentation obtained regarding customer identification at least for 5 years after termination of account relationship or transaction.
  - 15.15. Policies covering relationships with politically exposed persons are in place. They are consistent with industry practices existing in our country.
  - 15.16. Policies to reasonably ensure that our institution only operates with correspondent banks that possess licenses to operate in the countries of their origin. In addition we review our customers anti-money laundering practices before adopting that entity as a client.
  - 15.17. Monitoring program to detect suspicious or unusual activities that covers funds transfers and cash related transactions.
  - 15.18. Screening for customers or transactions of significantly high risk that might require special attention prior to transactions.
  - 15.19. We are actually implementing a risk rating process to evaluate the risks

<p>associated with customers and transactions.</p> <p>15.20. Higher level of enhanced due diligence for high risk clients, presenting risk of illicit activities (including but not limited to, money laundering, fraud or terrorist financing).</p> <p>15.21. Compliance with FATF 16</p>
<p>16. We provide services to the following sectors:</p> <p>16.1. Retail Clients (Individuals)</p> <p>16.2. Corporate Finance (offering of institutional equity, debt and derivatives trading services corporate and financial institution clients)</p> <p>16.3. Correspondent banking services in local and/or foreign currency to other financial institutions (Loro accounts)</p> <p>16.4. Private Clients/High Net Worth Individuals (we have a separate division to serve "high net worth" individuals, family trusts or private investment companies)</p> <p>16.5. Commercial Clients (e.g. Companies, Organisations)</p>
<p>17. Services to the following types of financial institutions are provided/not provided:</p> <p>17.1. Financial Institutions located outside of our country (<b>provided</b>)</p> <p>17.2. Offshore Banks (<b>not provided</b>)</p> <p>17.3. Internet Banks (<b>not provided</b>)</p> <p>17.4. Shell Banks (<b>not provided</b>)</p> <p>17.5. Money Service Businesses including money transmitters (<b>not provided</b>)</p>
<p>18. We do not provide a substantial portion (approx. 15% or more as a % of revenue or turnover) of our financial products or services:</p> <p>18.1. Precious Gem Dealers (Companies or individuals engaged in the mining, buying or selling of precious gems)</p> <p>18.2. Commodity Traders/Providers (Companies or individuals engaged in the extraction, mining or refining of raw materials, such as oil, minerals, gas, lumber, rubber, etc)</p> <p>18.3. Government Agencies</p> <p>18.4. Government Contractors (companies or individuals that sell or purchase services or products to or from Government Agencies)</p> <p>18.5. Professional Service Providers/PSPs (PSPs act as an intermediary between a client and a bank and include lawyers, accountants and other similar third-parties)</p> <p>18.6. Retail Remittances (for non-resident aliens and foreign individuals).</p> <p>18.7. Red Light Businesses (providers of adult entertainment)</p> <p>18.8. Arms Dealers</p> <p>18.9. Charities (including state licensed/regulated charities)</p> <p>18.10. (Internet) Gambling Business</p> <p>18.11. Virtual Currencies - Individuals trading or clearing as well as companies that produce virtual currencies ("miners") and virtual currency exchanges</p>
<p>19. We do not open accounts and/or establish relationships with and/or provide</p> <p>19.1. Anonymous accounts</p> <p>19.2. Non established costumers or walk-ins</p> <p>19.3. Third party check clearing or bulk cash services</p>
<p><b>III. GENERAL COMPLIANCE DECLARATION</b></p>
<p>20. Our institution complies with FATF Special Recommendation VII.</p>
<p>21. Our institution never had regulatory or criminal enforcement actions resulting from violations of anti-money laundering laws or regulations.</p>
<p>22. Our institution, to the best of our knowledge knowledge, has not been the subject of any investigation, indictment, conviction or civil enforcement action related to</p>

financing terrorists.

We confirm that, to the best of our knowledge, the above information is current, accurate and reflective of our institution's anti-money laundering policies.

**Steiermärkische Bank und Sparkassen AG**

**Sebastian Liehl**  
**Head of Compliance**



**19/02/2019**