

**Anti-Money Laundering and Counter Financing of Terrorism Policy Statement,
Know Your Customer Policy Statement and FATCA Status**

A. Basic Information

Our full legal name and address

Sparkasse Ulm
Hans-und-Sophie-Scholl-Platz 2
89073 Ulm
Germany
phone: 0049 731 101-0
mail to: kontakt@sparkasse-ulm.de
BIC/SWIFT: SOLADES1ULM
web: www.spkulm.de

Type of business and activity

We are a savings bank and a leading regional bank for private customers and especially for medium-sized companies in the district of Alb-Donau-Kreis, Germany.

Board of Managing Directors

Dr. Stefan Bill (Chairman of the Board of Management)
Ulrich Heisele (Member of the Board of Management)
Andreas Haltmayr (Member of the Board of Management)

Not any Board Member is a Politically Exposed Person (PEP).
All Board Members are German Citizens.

Shareholder & Foundation

Sparkasse Ulm has been 100% owned by the City of Ulm and the District of Alb-Donau-Kreis since it was founded in 1847. We are incorporated under public law.

Name of our regulators, registration number, tax identification no.

Supervisory authority responsible for the authorisation:
Europäische Zentralbank, Sonnemannstraße 20, 60314 Frankfurt am Main,
(Internet: www.ecb.europa.eu)

Supervisory authority responsible for consumer protection:
Bundesanstalt für Finanzdienstleistungsaufsicht, Graurheindorfer Straße 108, D-53117 Bonn,
Marie-Curie-Straße 24-28, D- 60439 Frankfurt am Main.

Accountant

Sparkassenverband Baden-Württemberg
Am Hauptbahnhof 2, D-70173 Stuttgart / Germany

B. Legal Framework, Corporate Governance

Our country established laws designed to prevent money laundering and terrorist financing and our institution is subject to such laws. Our institution established written policies designed to combat money laundering and terrorist financing, including measures to obtain information about the true identity of our customers. The policy is applicable to the headquarter and all branches.

Our KYC-Policy is based on and includes

- German law and the regulations of our institution prohibit the opening and maintenance of anonymous or numbered accounts
- We have an electronic system for the assessment of the transactions of our customers
- We screen customers and transactions against lists of persons, entities or countries issued by OFAC (USA), UN, EU and Federal Republic of Germany
- We have no business relationship with casinos

Our AML-Policy is also based on

- Guidelines issued by the FATF (Germany is a FATF member country)
- "Directive of the Council of the European Communities on the prevention of the use of the financial system for the purpose of money laundering" (Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 and the following Directives)
- The "German Money Laundering Act" (Geldwäschegesetz)
- Relevant guidelines issued by the Federal Banking Supervisory Office ("Bundesanstalt fuer Finanzdienstleistungsaufsicht") as banking supervision authority in Germany
- German Banking Act (Kreditwesengesetz)

We have not been subject of any civil or criminal enforcement actions resulting from violations of anti-money laundering regulation.

C. Through Accounts, correspondent banks, branches or subsidiaries abroad

We do not allow direct use of our correspondent accounts by third parties to transact business on their own behalf (i.e. payable-through accounts). We do not maintain any foreign branches or subsidiaries. We only co-operate with correspondent banks that are properly licensed.

We have not correspondent banks in Iran, Democratic People's Republic of Korea, Syria and Sudan.

D. FATCA Status

We confirm that we are compliant to FATCA regulations and have completed our FATCA registration process. We are registered on IRS with the status:

Registered deemed compliant FFI, Model 1 IGA

Our Global Intermediary Identification Number (GIIN) is as follows:

CVP5CM.99999.SL.276

E. Wolfsberg Questionnaire

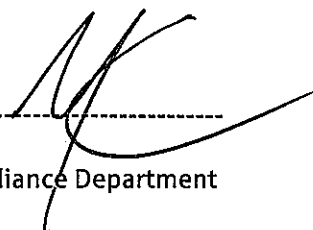
The Wolfsberg Group Anti-Money Laundering Questionnaire (FCCQ v1.2) completed by us on 16th September 2024 constitutes an essential part of our Anti Money Laundering policy and obtains information about

- General AML Policies, Practices and Procedures
- Risk Assessment
- Know Your Customer, Due Diligence and Enhanced Due Diligence
- Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds
- Transaction Monitoring
- AML Training

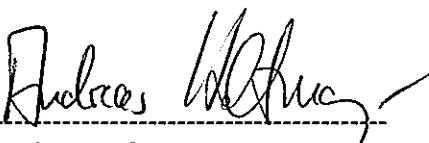
Chief Anti-Money-Laundering:

Mr. Michael Kast

Date and Signature:

13.01.25 

Michael Kast
Head of Compliance Department



Andreas Haltmayr
Member of the Board of Management