

Please find the explanation of our AML activities in the following questionnaire.

	YES	NO
Is money laundering considered as a crime in Germany?	X	
Has Germany established anti-money laundering laws/regulations?	X	
Is Sparkasse Dieburg subject to such laws and regulations?	X	
Has Sparkasse Dieburg established written internal procedures to implement anti-money laundering policies?	X	
Is implementation of anti-money laundering policies monitored on a permanent basis by a compliance officer and assessed by an internal audit functions on a yearly basis?	X	
Has Sparkasse Dieburg established an anti-money laundering employee-training program and records its training?	X	
Does Sparkasse Dieburg have record retention procedures that comply with applicable law?	X	
Do the regulations of Sparkasse Dieburg require:		
<ul style="list-style-type: none"> recognising the true identity of customers and checking their legitimacy and business activities? 	X	
<ul style="list-style-type: none"> monitoring client activities to detect any suspicious activities (risk-based assessment)? 	X	
<ul style="list-style-type: none"> reporting suspicious activities and transactions to the appropriate authorities? 	X	
<ul style="list-style-type: none"> special monitoring of relationships with customers and transactions with heightened risk (incl. politically exposed persons) and regularly update of information? 	X	
<ul style="list-style-type: none"> screening customers and transactions against list of persons, entities or countries issued by government/competent authorities? 	X	
<ul style="list-style-type: none"> regularly check its correspondent bank relations? 	X	
Do the regulations of Sparkasse Dieburg allow to:		
<ul style="list-style-type: none"> conduct business with banks having no physical presence in any countries(shell banks)? 		X
<ul style="list-style-type: none"> conduct business with banks having no physical presence in any countries maintain accounts for shell banks? 		X
<ul style="list-style-type: none"> maintain payable-through-accounts for correspondent banks? 		X
Has Sparkasse Dieburg appointed a person responsible for anti-money laundering arrangements?	X	
Name of external auditors:	Sparkassen- und Giroverband Hessen-Thüringen (SGVHT), Alter Rothofstr. 8-10, 60313 Frankfurt a. Main / Germany	
Name of the regulatory body which supervises our institution:	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFIN) Graurheindorfer Str. 108, 53117 Bonn/Germany	

Gross-Umstadt, March 28th, 2019

Sparkasse Dieburg
Compliance Officer

Peter Stein



Sparkasse Dieburg
Chairman of the Board

Manfred Neßler

