#### the Wolfsberg Group

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Sparebanken Øst

Location (Country) :

Norway

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

lo#	Question	Answer
. ENT	ITY & OWNERSHIP	
1	Fulf Legal <b>N</b> ame	Sparebanken Øst NO993 997 889
2	Append a list of branches which are covered by this questionnaire	Asker, Bragernes, Fredrikstad, Gulskogen , Hokksund, Holmestrand, Holtet, Hønefoss, Horten, Jessheim, Kongsberg, Konnerud, Krokstadelva, Lier, Mjøndalen, Oslo sentrum, Røyken, Sande, Skotselv, Slemmestad, Stavern, Stovner, Strømmen, Svelvik, Sætre, Tofte, Tønsberg, Vestfossen, Vikersund,
3	Full Legal (Registered) Address	Stasjonsgata 14 3300 HOKKSUND Norway
4	Full Primary Business Address (if different from above)	P.O.Box 67 3301 HOKKSUND
5	Date of Entity incorporation/ establishment	1843
6	Select type of ownership and append an pwnership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	f Y, indicate the exchange traded on and ticker symbol	Euronext Oslo
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	of the Entity's total shares composed of bearer shares	0 %
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Finanstilsynet
10	Provide Legal Entity Identifier (LEI) if available	5967007LIEEXZX4ZLK67
	y.	

11	Provide the full legal name of the ultimate parent	
l''	(if different from the Entity completing the DDQ)	n.a.
l	(If different from the Entity completing the DDQ)	
ı		
l		
12	Jurisdiction of licensing authority and regulator	
12	of ultimate parent	n.a.
l	or diffinate parent	
l		
l		
13	Select the business areas applicable to the	
l'*	Entity	
13 a	Retail Banking	Yes
	Private Banking / Wealth Management	No
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
		No No
13 e	Investment Banking	
13 f	Financial Markets Trading	No
13 g	Securities Services/ Custody	No
13 h	Broker/Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	n.a.
'		II.a.
l		
l		
14	Does the Entity have a significant (10% or	
l	more) offshore customer base, either by	
l	number of customers or by revenues (where off-	No
l	shore means not domiciled in the jurisdiction	
	where bank services are being provided) ?	
14 a	If Y, provide details of the country and %	
15	Select the closest value:	
	Select the closest value:	51-200
15 a	Select the closest value: Number of employees	
15 a 15 b	Select the closest value: Number of employees Total Assets	51-200 Greater than \$500 million
15 a	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the	Greater than \$500 million
15 a 15 b	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are	
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Greater than \$500 million
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches If N, clarify which questions the difference/s	Greater than \$500 million
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Greater than \$500 million Yes
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches If N, clarify which questions the difference/s	Greater than \$500 million Yes
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches If N, clarify which questions the difference/s	Greater than \$500 million Yes
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Greater than \$500 million Yes
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional	Greater than \$500 million Yes
15 a 15 b 16	Select the closest value:  Number of employees  Total Assets  Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this	Greater than \$500 million  Yes  n.a.
15 a 15 b 16	Select the closest value: Number of employees Total Assets Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional	Greater than \$500 million  Yes  n.a.
15 a 15 b 16	Select the closest value:  Number of employees  Total Assets  Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information / context to the answers in this	Greater than \$500 million  Yes  n.a.



2. PR	PRODUCTS & SERVICES		
17	Does the Entity offer the following products and		
	services:		
17 a	Correspondent Banking	No	
17 a1	lf Y		
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?		
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?		
17 a4	Does the Entity have processes and procedures		
17 44	in place to identify downstream relationships with domestic banks?		
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?		
17 a6	Does the Entity allow downstream relationships		
17 40	with Foreign Banks?		
17 a7	Does the Entity have processes and procedures		
II ar	in place to identify downstream relationships with Foreign Banks?	r ·	
17 a8	Does the Entity offer correspondent banking		
	services to regulated MSBs/MVTS?		
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?		
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?		
17 b	Private Banking (domestic & international)	No	
17 c	Trade Finance	No	
17 d	Payable Through Accounts	No	
17 e	Stored Value Instruments	No	
17 f	Cross Border Bulk Cash Delivery	No No	
17 a	Domestic Bulk Cash Delivery	No	
17 h	International Cash Letter	No	
17 i	Remote Deposit Capture	No	
17 i	Virtual /Digital Currencies	No	
17 k	Low Price Securities	No	
17 I	Hold Mail	No	
17 m	Cross Border Remittances	No No	
17 m	Service to walk-in customers (non-account		
'' <sup>"</sup>	holders)	No	
17 o	Sponsoring Private ATMs	No	
17 p	Other high risk products and services identified by the Entity	n.a.	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes	
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n.a.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	Sparebanken Øst has a Partnerbank agreement with DNB providing international payments for our clients through Propay.	



3 AN	L. CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
1,2	minimum AML, CTF and Sanctions standards	
1	regarding the following components:	
19 a	Appointed Officer with sufficient	
l'" "	experience/expertise	Yes
19 b	Cash Reporting	Yes
19 c	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 a	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 [	Sanctions	Yes
19 k	PEP Screening	Yes
19 (	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the	
	Entity's AML, CTF & Sanctions Compliance	10-50
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
ı	Management Committee receive regular	Yes
ı	reporting on the status of the AML, CTF &	
_	Sanctions programme?	
23	Does the Entity use third parties to carry out any	
ı	components of its AML, CTF & Sanctions	Yes
23 a	programme? If Y, provide further details	
23 a	ii 1, provide further details	DNB and TletoEvry for sanction screening
I		
ı		
24	Confirm that all responses provided in the above	
I	Section AML, CTF & SANCTIONS Programme	Yes
	are Representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s	n.a.
ı	relate to and the branch/es that this applies to,	
ı		
24 b	If appropriate, provide any additional	
I	information / context to the answers in this	n.a.
I	section.	
I		



4 44	TI BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	No
29 b	Third parties acting on behalf of the Entity	No
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
30 ь	Includes enhanced requirements regarding Interaction with public officials?	No
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes



35	Done the Callede ADC CHICA	
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	-
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	No
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 с	Transactions, products or services, including thosethat involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and nospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training	
37 a	Board and Senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	if appropriate, provide any additional information context to the answers in this section.	



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40 c Sanctions violations			194
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information / context to the answers in this			
information / context to the answers in this	46 h	If appropriate, provide any additional	a all
			II.d.

6. AN	IL, CTF & SANCTIONS RISK ASSESSME	NT A CONTRACTOR OF THE PARTY OF
47	Does the Entity's AML & CTF EWRA cover the	
	inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the	160
	controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been	
	completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been	1700
	completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	if N, clarify which questions the difference/srelate to and the branch/es that this applies to.	n.a.:
53 b	If appropriate, provide any additional information / context to the answers in this section.	n.a.

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7. KY	C, CDD and EDD	
54	Does the Entity verify the identity of the	
	customer?	Yes
55	Do the Entity's policies and procedures set out	
	when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
	·	
56	Which of the following does the Entity gather and retain when conducting CDD? Select	
	all that apply:	
-		
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	n.a.
58	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	25%
59	Does the due diligence process result in	
	customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine	
	the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 Ь	Geography	Yes
60 с	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	No
60 f	Other (specify)	Transactions, nationality, cash usage
		t and the second

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	No
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	No
63 b	Manual	Yes
63 c	Combination of automated and manual	No
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	Yes
66 b	Manual	No
66 c	Combination of automated and manual	No
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes



70	From the list below, which categories of customers or industries are subject to EDD and/ or are restricted, or prohibited by the Entity's FCC programme?	
70 a	Non-account customers	Prohibited
70 b	Offshore customers	EDD & Restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibited
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	Prohibited
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	Prohibited
70 j	Atomic power	Prohibited
70 k	Extractive industries	Prohibited
70 I	Precious metals and stones	Prohibited
70 m	Unregulated charities	EDD on a risk based approach
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	EDD on a risk based approach
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	Prohibited
70 t	Gambling	Prohibited
70 u	Payment Service Provider	Prohibited
70 v	Other (specify)	
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	n,a,
73 b	If appropriate, provide any additional information / context to the answers in this section.	n.a.



	NITORING & REPORTING	
74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the	
	identification and reporting of suspicious	Yes
	activity?	
75	What is the method used by the Entity to	
	monitor transactions for suspicious activities?	
75 a	Automated	Yes
75 b	Manual	
	Combination of automated and manual	No
75 c		No
76	If manual or combination selected, specify what type of transactions are monitored manually	n,a,
77	Does the Entity have regulatory requirements to report currency transactions?	Yes
77 a	If Y, does the Entity have policies, procedures	
// a	and processes to comply with currency reporting requirements?	Yes
78	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
70	06	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	n.a.
79 b	If appropriate, provide any additional information / context to the answers in this section.	n.a.
9. PA 80	YMENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and	
	processes to [reasonably] comply with and have controls in place to ensure compliance with:	
61 a	FATF Recommendation 16	No
B1 b	Local Regulations	Yes
	Specify the regulation	
0101	Specify the regulation	Relevant Norwegian and EU regulations.
B1 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes



84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the aboveSection PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	if N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n,a,
85 b	If appropriate, provide any additional information / context to the answers in this section.	n.a.
10 S	ANCTIONS	
86	Does the Entity have a Sanctions Policy	
	approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
87	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
88	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
90	What is the method used by the Entity?	
90 a	Manual	No
90 b	Automated	Yes
90 c	Combination of Automated and Manual	No
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
92	What is the method used by the Entity?	
92 a	Manual	No
92 b	Automated	Yes
92 c	Combination Automated and Manual	No
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93 ө	Lists maintained by other G7 member countries	

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lan c	lou t #1	
93 f	Other (specify)	n,a,
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:	
95 a	Customer Data	Same day to 2 days
95 b	Transactions	Same day to 2 days
96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
11. TF	RAINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 ө	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Not Applicable
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	if N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n.a.
102 b	If appropriate, provide any additional information / context to the answers in this section.	n.a.
12. QI	UALITY ASSURANCE /COMPLIANCE TE	STING
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	n.a.
105 b	If appropriate, provide any additional information / context to the answers in this section,	n.a.
13. A	UDIT	
106	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly

108	Does the internal audit function or other	
	independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 (	Other (specify)	n.a.
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the aboveSection,AUDIT are representative of all the LE's branches	Yes
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	n.a.
110 b	If appropriate, provide any additional information / context to the answers in this section.	п.а.



# **Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

Declaration Statement (To be signed by Global Head of Correspondent Banking or

Compliance OR equivalent)	ND Group Money Laundering Prevention Officer, Global Head of nief Compliance Officer, Global Head of Financial Crimes
Sparebanken Øst	(Bank name) is fully committed to the fight against financial
	rt to remain in full compliance with all applicable financial crime ards in all of the jurisdictions in which it does business and holds
Sparebanken Øst	(Bank name) understands the critical importance of having
effective and Sustainable co	entrols to combat financial crime in order to protect its reputation
and to meet its legal and re	gulatory obligations.
regarding parties to transac adopting these standards.	(Bank name) recognises the importance of transparency tions in international payments and has adopted/is committed to
Sparebanken Øst	(Bank name) further certifies it complies with/is working to
Finance Principles. The info	Correspondent Banking Principles and the Wolfsberg Trade brmation provided in this Wolfsberg CBDDQ will be kept current frequently than on an annual basis.  (Bank name) commits to file accurate supplemental
information on a timely basi	
, Kjell Engen (Deputy CEO)	(Global Head of Correspondent Banking or equivalent), understood this declaration, that the answers provided in this
Wolfsberg CBDDQ are com to execute this declaration of	
Wolfsberg CBDDQ are come to execute this declaration of the Landson (MLRO)	on behalf of Sparebanken Øst (Bank name)  (MLRO or equivalent), certify that I have read and
Wolfsberg CBDDQ are come to execute this declaration of the control of the contro	on behalf of Sparebanken Øst (Bank name)  (MLRO or equivalent), certify that I have read and that the answers provided in this Wolfsberg CBDDQ are
Wolfsberg CBDDQ are come to execute this declaration of the control of the contro	(MLRO or equivalent), certify that I have read and that the answers provided in this Wolfsberg CBDDQ are honest belief, and that I am authorised to execute this