

Financial Institution Name: Danske Andelskassers Bank A/S

Location: Denmark

This questionnaire acts as an aid to firms conducting due diligence and should not be relied on exclusively or excessively. Firms may use this questionnaire alongside their own policies and procedures in order to provide a basis for conducting client due diligence in a manner consistent with the risk profile presented by the client. The responsibility for ensuring adequate due diligence, which may include independent verification or follow up of the answers and documents provided, remains the responsibility of the firm using this questionnaire.

Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

I. General AML Policies, Practices and Procedures:	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y x	N o
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y x	N o
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y x	N o
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y x	N o
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? <i>(A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)</i>	Y x	N o
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y x	N o
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y x	N o
8. Does the FI have record retention procedures that comply with applicable law?	Y x	N o
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y x	N o

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II. Risk Assessment:	<u>Yes</u>	<u>No</u>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y x	N o
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y x	N o
III. Know Your Customer, Due Diligence and Enhanced Due Diligence:	Yes	No
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y x	N o
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y x	N o
14. Does the FI assess its FI customers' AML policies or practices?	Y	N x
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y x	N o
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y x	N o
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y x	N o
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:	Yes	No
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y x	N o
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y x	N o
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y x	N o
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y x	N o
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ¹	Y x	N o
V. Transaction Monitoring:	Yes	No
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y x	N o

¹ The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

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VI. AML Training	<u>Yes</u>	<u>No</u>
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	Y x	N o
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y x	N o
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y x	N o
27. Does the FI employ third parties to carry out some of the functions of the FI?	Y o	N x
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	Y	N o

Space for additional information:

(Please indicate which question the information is referring to.)

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Name: Carsten Strandholt
Title: Head of department and appointed as responsible for AML
Signature:
Date: 14.03.18

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Information regarding prevention of money- laundering and terror- financing

A. Information on Institution

A.1. Physical Address:

Danske Andelskassers Bank A/S
Baneskellet 1, Hammershøj
DK- 8830 Tjele
Registration number: 31 84 32 19
Phone: +45 87 99 30 00
Telefax: +45 87 99 31 95
E-mail: middleoffice@dabank.dk

A.1. Board members list:

Anders Howalt-Hestbech, Manager (Chairman)
Klaus Moltesen Ravn, Farming Technologist (Deputy Chairman)
Bent Andersen, former CEO DLR Kredit A/S
Poul Weber, Fruit Grower
Tommy Skov Kristensen, Manager
Heine Bach, former Region Manager
Michael Vilhelm Nielsen, Lawyer
Britta Rytter Eriksen, Adviser
Jørn Hjalmar Andersen, Private Account Manager
Anette Holstein Nielsen, Adviser

A.2. List of executives

Jan Pedersen, CEO

A.3. Principal business of institution

Commercial banking

A.4. Number of branches

We have 16 Danish branches.

B. Policies and Procedures

B.1. Law

Denmark is member of EU and the EU-rules on money-laundering and terror- financing are fully implemented in the Danish legislation.

B.2. Program for prevention of money-laundering and terror- financing

Appropriate action is taken in order to prevent money-laundering and terror- financing in the organization. Every payment is scanned. The customer relation is based on personal knowledge of each client. The staff is trained to spot suspicious transactions and customers. All incidents are reported to the authorities.

B.3. Reporting officer

The officers responsible for money-laundering and terror- financing reporting is Head of department, Mr. Carsten Strandholt (cas@dabank.dk)

B.4. Audit

Danske Andelskassers Bank A/S has an internal audit, independent of the compliance officers. Head of Audit is Mr. Kristian Thorgaard Sørensen (kts@dabank.dk)

B.5. Training programs

Employees shall conduct e-learning training programs regarding anti-money laundering and terror-financing.

B.6. Review, audit and compliance

The routines are optimized whenever the need is detected. Money-laundering and terror-financing prevention is subject to audit like all other banking-areas.

B.7. Application of policies to branches and subsidiaries

Danske Andelskassers Bank A/S has 16 branches and subsidiaries. The policies apply for the branches.

B.8. Know your customer (KYC), Due diligence

All customer contact is based on knowledge of the single customer. Due automated cooperation with the authorities, all changes regarding a customer are updated in the banking-system automatically.

B.9. Reporting

Suspicious activities and transactions are reported to Middle Office that reports to the authorities.

B.10. Records of customer identification

All customers' related data is filed according to the legislation for the area.

B.11. Opening of accounts for foreign banks

No accounts are opened for banks without physical presence (shell banks)

B.12. The following elements are part of the money laundering and terror financing prevention policy:

- Customer identification and verification
- KYC Procedures
- Determining customer profile
- Procedures to identify and verify the source of funds of international transfers

B.13. Monitoring of accounts and transactions

All foreign transactions are scanned automatically

B.14. FATF-GAFI special recommendations

Are followed as far as applicable in Denmark.

B.15. System for detection of accounts in the name of persons appearing on Bush- list, ONU- list, European Union List, OFAC- list, GAFI- list, Clinton- list

All payment are scanned against EU-terror lists, OFAC-list and FATF's list through our service bureau.

In case of further questions please contact

Head of department

Carsten Strandholt

cas@dabank.dk