# the Wolfsberg Group

Financial Institution Name: Location (Country) :

Kommunalbanken AS Norway

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches, it a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is

	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
		Kommunalbanken AS
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		n.a.
3	Full Legal (Registered) Address	
	,	Haakon VII's gate 5b
		0161 Oslo, Norway
		o is i osis, no may
4	Full Primary Business Address (if different from above)	
	(	
5	Date of Entity incorporation/establishment	
•	Date of Entity meorporation/cottabilistinicity	
		01.11.1999
6	Calcut type of supporable and append on supposable aband	
•	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No.
6 a 1	If Y, indicate the exchange traded on and ticker	No
oar	symbol	
	- Symbol	
6 b	Member Owned/Mutual	N.
8 c	Government or State Owned by 25% or more	No Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	TNO
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
	or are array a total original or obtained original original	
		0 %
3	Does the Entity, or any of its branches, operate under an	
	Offshore Banking License (OBL)?	No .
За	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	no
		no
	services only through online channels?	
	services only through online channels?	no The Financial Supervisory Authority of Norway
	services only through online channels?	
10	services only through online channels?  Name of primary financial regulator/supervisory authority	
10	services only through online channels?	The Financial Supervisory Authority of Norway
0	services only through online channels?  Name of primary financial regulator/supervisory authority	
0	services only through online channels?  Name of primary financial regulator/supervisory authority	The Financial Supervisory Authority of Norway
1	services only through online channels?  Name of primary financial regulator/supervisory authority	The Financial Supervisory Authority of Norway
1 2	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available	The Financial Supervisory Authority of Norway
1 2	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if	The Financial Supervisory Authority of Norway
1	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if	The Financial Supervisory Authority of Norway
1	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	The Financial Supervisory Authority of Norway
1 2 3	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if	The Financial Supervisory Authority of Norway
2	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  Jurisdiction of licensing authority and regulator of ultimate parent	The Financial Supervisory Authority of Norway
1 2 3	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  Jurisdiction of licensing authority and regulator of ultimate parent	The Financial Supervisory Authority of Norway  I7ETN0QQO2AHZZGHJ389
2	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  Jurisdiction of licensing authority and regulator of ultimate parent	The Financial Supervisory Authority of Norway  I7ETN0QQO2AHZZGHJ389
2	services only through online channels?  Name of primary financial regulator/supervisory authority  Provide Legal Entity Identifier (LEI) if available  Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)  Jurisdiction of licensing authority and regulator of ultimate parent  Select the business areas applicable to the Entity	The Financial Supervisory Authority of Norway  I7ETN0QQO2AHZZGHJ389



14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 )	Wealth Management	No
14 k	Other (please explain)	Kommunalbanken AS holds a license as credit institution issued by The Financial Supervisory Authority of Norway. Kommunalbanken AS provide loans in Norwegian krone only to Norwagian municipalities and counties and to other entities guaranteed by municipalities and counties.
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
	Total Assets	
16 b	Confirm that all responses provided in the above Section	Greater than \$500 million
17	are representative of all the LE's branches.	
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	Kommunalbanken AS has no branches. All customers of Kommunalbanken AS reside in Norway using norwegian banks when conducting business with Kommunalbanken AS
	ULOTO A AERICANO	
	OUCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	
19 a1b	Does the Entity allow domestic bank clients to	
19 a1c	provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with descriptions of the place of	
19 a1d	domestic banks?  Does the Entity offer Correspondent Banking	
19 a1e	services to foreign banks?  Does the Entity allow downstream relationships	
19 a1f	with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with	
19 a1g	foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	
19 a1h2		
	MVTSs	
9 a1h3	MVTSs PSPs	



Does the Fairly have processes and procedures when the state of the processes and procedures with the state of the processes and procedures when the state of the processes and procedures when the processes and procedures and procedure		1 5 4 5 5 1	
MSS BATTSRPSPS2  10 Cores Border Bird Carb Delays No. 19 Cores Batts No. 19 Co	19 a1i	Does the Entity have processes and procedures	
19 B. Cross-Border Residences 19 C.			
19 d. Drosse Golde Carb Delevey No   19 d. Drosse Golde Carb Delevey No   19 d. List Med			
19 a	19 b	Cross-Border Bulk Cash Delivery	No
19 a Demosite Bulk Cash Delivery No 19 a Held Mail No 19 b Held Mail No 19 b Held Mail No 19 b Person State Cash Cash Cash Cash Cash Cash Cash Cash	19 c	Cross-Border Remittances	No
19 9 Hold Mail No. 19 19 Low Price Societies No. 19 10 Low Price Societies No. 19 10 Low Price Societies No. 19 11 Private Service to non-bank entities who may then offer third party asyment services to their customers? 19 11 FY , please select all that apply below? 19 12 Third Party Payment Services to their customers? 19 12 Third Party Payment Services to their customers? 19 13 Vertual Acast Service Providers 19 15 Often - Please capital 19 15 Often - Please capital 19 16 Often - Please capital 19 17 Tride Finance 19 10 Societies No. 19 11 Societies No. 19 11 Tride Finance 19 10 Tride Finance 19 10 Tride Finance 19 10 Tride Finance 19 11 Tride Finance 19 12 Check cashing service 19 12 Check cashing service 19 12 Check cashing service 19 13 Check cashing service 19 14 Check cashing service 19 15 Tride Finance 19 16 Tride Finance 19 17 Tride Finance 19 18 Tride Finance 19 19 Thirde Finance 19 10 Tride Finance 19 10 Tride Finance 19 11 Tride Finance 19 12 Tride Finance 19 12 Tride Finance 19 12 Tride Finance 19 13 Tride Finance 19 14 Tride Finance 19 15 Tride Finance 19 15 Tride Finance 19 16 Tride Finance 19 17 Tride Finance 19 18 Tride Finance 19 19 Tride Finance 19 10 Tride Finance 10 Tride		Domestic Bulk Cash Delivery	
19 g. Low Price Sourcins No.  19 g. Low Price Sourcins No.  19 h. Payable Trecogn Accounts No.  19 l. Private Service to no branch entities who may then other with pany payment services to their customers?  19 l. Private Service Accounts No.  19 l. Private Service Providers (ASPs)  19 d. Other - Please explain  19 l. Private Banking  19 l. Private Banking  19 l. Private Banking  19 l. Remote Deposit Coglute (RDC) No.  19 l. Secondrip Pficties ATMS No.  19 l. Virtual Assession No.  19 p. Virtual Assession No.  10 p. Virtual Assession No.			
19 1 Purpose Sociarios Income and Personal Provincia Pro			
19   Psystem Envirous hours but her customers?  19   If y present services to their customers?  19   If Y plass a state of all and apply-below?  19   If Y plass a state of all and apply-below?  19   If Y plass a state of all and apply-below?  19   If Y plass a state of a browlers a plant apply-below?  19   If Private Paramet Services Providers (VASPs)  19   If Private Paramet Services Private Privat			
offer third party parent services to the cutoment?  19 II II III Y, please select all that apply below?  19 II III Y, please select all that apply below?  19 III III Y, please select all that apply below?  19 III III III Y, please select all that apply below?  19 III Offer - Please explain  19 III Offer - Please explain  19 III Private Banking  19 III Private Banking  19 III Secondary III Century (IDD)  10 III Secondary III Secondary (IDD)  10 III Seco			
offer third party payment services to their customers?  19 11 If Y., please select all that apply, below?  19 12 Third Party Payment Service Providers  19 13 Whund Assat Service Providers  19 15 Cher - Please orphan  19 1 Private Banking  19 1 Private Banking  19 1 Private Banking  19 1 No.  19 1 Remote Deposit Capture (RDC)  No.  19 1 Sprometing Private Mark  No.  19 m Storced Value Instruments  No.  19 n Storced Value Instruments  No.  19 p For each of the following please state whether you offer the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and if so, the assatisation of the service to walk-in-customers and in-customers and in-customer			
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19   S			
19   Private Banking   No   19   Remotib Deposit Capture (RDC)   No   19   Stored Value Instruments   No   19 m   Stored Value Instruments   No   19 m   Trade Finance   19 n   Trade Finance   19 p1   Trade Finance   19 p1   For each of the following please state whether you   19 p1   Trade Finance   19 p1   Trade Finance   19 p1   Check casting service   No   19 p1   Trade Finance   19 p2   Trade Finance   19 p2   Trade Finance   19 p2   Trade Finance   19 p2   Trade Finance   19 p3   Trade Finance   19 p4   Trade Finance   19 p4   Trade Finance   19 p4   State of Moretary Instruments   No   19 p4   Trade Finance   19 p4			
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19 1 Sponsoring Privale ATMs No 19 m Stored Vable instruments No 19 m Trade Finance No 19 n Trade Finance No 19 p For each of the following please state whether your offer the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and in the service to walk in customers and if so, the service to walk in customers and if so, the service to walk in customers and in the service to walk in the service to wal			In the state of th
19   Spronsoft private ATMs No 19 m Stored Value instruments No 19 n Trade Finance No 19 o Virtual Assets No 19 o Virtual Assets No 19 p For each of the following please state whether you offer the service to walk it outsomers and if so, the best of the continuence of the contin			
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19 m Sicrot Vable Instruments No 19 n Trade Finance No 19 n Trade Finance No 19 n For each of the following please state whether you offer the service to wake in customers and if so, the applicable level of due diligence (19 pt 19 pt	19 k	Remote Deposit Capture (RDC)	No
19 m Stored Vable Instruments No 19 n Trade Finance No 19 o Virtual Assets No 19 p For each of the following please state whether you offer the service to walk in customers and if so, the accidence level of due dilisence.  19 p1 Check cashing service 19 p1 Check cashing service 19 p2 With transfers No 19 p2 With transfers No 19 p3 Trues, state the applicable level of due diligence No 19 p3 Trues, state the applicable level of due diligence No 19 p3 Trues, state the applicable level of due diligence No 19 p3 Trues, state the applicable level of due diligence No 19 p3 Trues, state the applicable level of due diligence No 19 p4 Sale of Monetary Instruments 19 p4 Sale of Monetary Instruments 19 p4 If you offer other services to well-diligence No 19 p4 If you offer other excitos to well-diligence No 19 p4 If you offer other excitos are well-diligence No 19 p4 If you offer other observables well-due to diligence No 19 p4 If you offer other observables well-due to diligence No 19 p5 For observable the applicable level of due diligence No 19 p4 If you offer other observables well-due to diligence No 19 p6 If you offer other observables well-due to due to diligence No 19 p6 If you offer other observables of the diligence No 19 p7 Other high-tisk products and services identified by the Entity (please specify)  19 q Other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  10 other high-tisk products and services identified by the Entity (please specify)  11 offer high-tisk products and services identifie			
19 n Trade Finance No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the anoticable level of due dilisence:  19 p1 Check cashing service No 19 p2 Wire transfers 19 p2 Wire transfers 19 p3 Foreign currency conversion No 19 p2a If yes, state the applicable level of due diligence No 19 p3 If yes, state the applicable level of due diligence No 19 p3 If yes, state the applicable level of due diligence No 19 p4 Sale of More reviews to walk-in customers please provide more detail here, including describing the level of due diligence No 19 p4 Sale of More services to walk-in customers please provide more detail here, including describing the level of due diligence No 19 p4 If yes, state the applicable level of due diligence No 19 p4 If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  19 q Other high-risk products and services identified by the Entity (please specify)  20 Confirm that all responses provided in the above Section are representative of all the LFs branches.  21 If appropriate, provide any additional information/context to the answers in this section.  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the Norman AML, CTF and Sanctions s			
19 p For each of the following please state whether you offer the service to walk-in customers and if so, the anolicable level of due diligence.  19 p1 Check cashing service 19 p2 Write transfers 19 p2 Write transfers 19 p3 Foreign currency conversion 19 p4 If yes, state the applicable level of due diligence 19 p5 Foreign currency conversion 19 p6 If yes state the papicable level of due diligence 19 p7 Foreign currency conversion 19 p6 If yes state the papicable level of due diligence 19 p7 Foreign currency conversion 19 p6 If yes offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  19 p7 Check page 19 p6 If you offer other services in dwalk-in customers please provide more detail here, including describing the level of due diligence.  19 q Cherr high-risk products and services identified by the Entity (please specify)  10 q Cherr high-risk products and services identified by the Entity (please specify)  10 are recreasefultive of all fine LE's branches.  10 a If appropriate, provide any additional information/context to the answers in this section.  10 a If appropriate, provide any additional information/context to the answers in this section.  10 AML, CTF & SANCTIONS PROGRAMME  22 D Des the Entity have a programme that sets minimum AML, CTF and Sanctons standards regarding the following combonates of the product of the programme that sets minimum AML, CTF and Sanctons standards regarding the following combonates of the product			
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apolicable level of due dilisence: 19 pt	19 p		
19 pf   Check cashing service   No   19 pf   If yes, state the applicable level of due diligence   19 p2   Wire transfers   No   19 p2   Hyes, state the applicable level of due diligence   19 p3   Foreign currency conversion   No   19 p3   If yes, state the applicable level of due diligence   19 p4   Sale of Monetary Instruments   No   19 p4   If yes, state the applicable level of due diligence   19 p5   If yes state the applicable level of due diligence   19 p6   If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence   19 p7   Other high-risk products and services identified by the   Entity (please specify)   no   20   Confirm that all responses provided in the above Section are rearresentative of all the LE's branches.   20 a   If N, clarify which questions the difference's relate to and the branch's that this applies to.   21   If appropriate, provide any additional information/context to the answers in this section.   Kommunalbanken AS has no branches.   22   Does the Entity have a programme that sets minimum following components:   23   AMIL, CTF & SANCTIONS PROGRAMME   Does the Entity have a programme that sets minimum following components:   24   Appointed Officer with sufficient experience/expertise   Yes   25   Adverse Information Screening   Yes   26   CDD   Yes   27   EDD   Yes   28   Other high-risk provide and and regarding the yes   29   Decision Reporting   Yes   21   Policies and Procedures   Yes   22   Policies and Procedures   Yes   22   Policies and Procedures   Yes   22   Policies and Procedures   Yes   23   Policies and Procedures   Yes   24   Yes   Policies and Procedures   Yes   25   Policies and Procedures   Yes   26   Yes   Yes			
19 pt a   If yes, state the applicable level of due diligence			
19 p2 Wire transfers No 19 p2a If yes, state the applicable level of due diligence 19 p3 Foreign currency conversion 19 p3 Foreign currency conversion 19 p3 If yes, state the applicable level of due diligence 19 p4 Sale of Monetary Instruments 10 p4 If yes, state the applicable level of due diligence 19 p5 If you offer other services to walk in customers please provide more detail here, including describing the level of due diligence. 19 p6 Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk products and services identified by the Entity (please specify) 19 q Other high-risk provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/or relate to and the branches that this applies to.  Kommunalbanken AS has no branches.  8. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML. CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient experience/expertise 23 b Adverse Information Screening 24 c Beneficial Ownership 25 c Beneficial Ownership 26 c Beneficial Ownership 27 yes 28 c Dob Helpendent Testing 29 yes 20 d Independent Testing 20 yes 21 periodice and Procedures 20 yes 21 periodice and Procedures 20 yes	19 p1	Check cashing service	No
19 p2a	19 p1a	If yes, state the applicable level of due diligence	
19 p2a	19 p2		
19 p3   Foreign currency conversion   No   19 p4a			
19 pd   Sale of Monetary Instruments   No     19 pd   Sale of Monetary Instruments   No     19 pd   If yes, state the applicable level of due diligence     19 pd   If yes, state the applicable level of due diligence     19 pd   If yes of other services to walk in customers please provide more detail here, including describing the level of due diligence.     19 q   Other high-risk products and services identified by the Entity (please specify)   no     20   Confirm that all responses provided in the above Section are representative of all the LE's branches.     20 a			
Sale of Monetary Instruments   No			
19 pda			
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  19 q Other high-risk products and services identified by the Entity (please specify)  10 Confirm that all responses provided in the above Section are representative of all the LE's branches.  20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  22 Kessential Content of the Content of			
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describing the level of due diligence.  19 q  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  20 a  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 section.  Kommunalbanken AS has no branches.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AMIL, CTF and Sanctions standards regarding the following combonents:  22 a Appointed Officer with sufficient experience/expertise Ves  22 b Adverse Information Screening Ves  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  23 g Independent Testing Yes  24 l Periodic Review Yes  25 l Per Screening Yes  26 l Per Screening Yes  27 per Screening Yes  28 per Screening Yes  29 per Screening Yes  20 per Screening Yes  21 PED Screening Yes  22 k Risk Assessment Yes	19 p5		
20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  22 K Robert 19 Periodic Review Yes 23 L Robert 19 Periodic Review Yes 22 Independent Testing Yes 23 Independent Testing Yes 24 Independent Testing Yes 25 Independent Testing Yes 26 Independent Testing Yes 27 Independent Testing Yes 28 Independent Testing Yes 29 Independent Testing Yes 20 Independent Testing Yes 21 Independent Yes 22 Independent Testing Yes 23 Independent Testing Yes 24 Independent Testing Yes 25 Independent Yes 26 Independent Yes 27 Independent Yes 28 Independent Yes 29 Independent Yes 20 Independent Yes 20 Independent Yes 21 Independent Yes 22 Independent Yes			
Entity (please specify)  Confirm that all responses provided in the above Section 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 section.  Kommunalbanken AS has no branches.  AML, CTF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise yes  Adverse Information Screening Yes  Adverse Information Screening Yes  CDD Yes  Le CDD Yes  Independent Testing Yes  Independent Y		describing the level of due diligence.	no
Entity (please specify)  Confirm that all responses provided in the above Section 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 section.  Kommunalbanken AS has no branches.  AML, CTF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise yes  Adverse Information Screening Yes  Adverse Information Screening Yes  CDD Yes  Le CDD Yes  Independent Testing Yes  Independent Y			
Entity (please specify)  Confirm that all responses provided in the above Section 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 section.  Kommunalbanken AS has no branches.  AML, CTF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise yes  Adverse Information Screening Yes  Adverse Information Screening Yes  CDD Yes  Le CDD Yes  Independent Testing Yes  Independent Y	40	Other bish deleganded and a color to the CC at the	
20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  21 Kommunalbanken AS has no branches.  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 A Appointed Officer with sufficient experience/expertise yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 23 g Independent Testing Yes 24 g Independent Testing Yes 25 h Periodic Review Yes 26 periodic Review Yes 27 periodic Review Yes 28 periodic Review Yes 29 per Periodic Review Yes 20 per Periodic Review Yes 20 per Periodic Review Yes 21 periodic Review Yes 22 per Periodic Review Yes 25 periodic Review Yes 26 Risk Assessment Yes 27 Periodic Review Yes 28 Risk Assessment Yes	19 q		
20 a Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  22 If appropriate, provide any additional information/context to the answers in this section.  23. AML, CTF & SANCTIONS PROGRAMME  24 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 25 Appointed Officer with sufficient experience/expertise following components: 26 Adverse Information Screening 27 Yes 28 Deenficial Ownership 28 Ves 29 Cash Reporting 30 Ves 31 Reporting 49 Ves 49 Cash Reporting 49 Ves 49 Cash Reporting 49 Ves 49 Periodic Review 49 Ves 40 Risk Assessment 40 Ves 41 Risk Assessment 40 Ves 41 Risk Assessment 40 Ves 41 Risk Assessment 41 Reviews 42 Risk Assessment 42 Reviews 45 Risk Assessment 45 Reviews 46 Risk Assessment 46 Risk Assessment 47 Risk Assessment 47 Risk Assessment 48 Risk Assessment 49 Risk Assessment 40 Risk Assessment 41 Risk Assessment 41 Risk Assessment 41 Risk Assessment 42 Risk Assessment 43 Risk Assessment 44 Risk Assessment 45 Risk Assessment 46 Risk Assessment 47 Risk Assessment 47		Entity (please specify)	
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 section.  Kommunalbanken AS has no branches.  Kommunalbanken AS has no branches.  Kommunalbanken AS has no branches.  James ABAL, CTF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Yes  Adverse Information Screening Yes  Cash Reporting Yes  Cach Reporting Yes  CDD Yes  Independent Testing Yes			no
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 section.  Kommunalbanken AS has no branches.  Kommunalbanken AS has no branches.  AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 c Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 h Periodic Review Yes  22 h Pelotices and Procedures Yes  22 h Risk Assessment Yes  22 k Risk Assessment			
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 section.  Kommunalbanken AS has no branches.  Kommunalbanken AS has no branches.  AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 c Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 h Periodic Review Yes  22 h Pelotices and Procedures Yes  22 h Risk Assessment Yes  22 k Risk Assessment	00	Confirm that all responses are sided in the above Continu	
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and the branch/es that this applies to.  21 If appropriate, provide any additional information/context to the answers in this section.  Xommunalbanken AS has no branches.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient experience/expertise Pes 22 b Adverse Information Screening Pes 22 c Beneficial Ownership Pes 22 c Cash Reporting Pes 22 c CDD Pes 24 EDD Pes 25 EDD Pes 26 EDD Pes 26 EDD Pes 27 EDD Periodic Review Pes 27 EDD Periodic Review Pes 28 EDD Periodic Review Pes 29 EDD Periodic Review Pes 29 ED Periodic Review Pes 20 ED Periodic Review Pe			
21 If appropriate, provide any additional information/context to the answers in this section.  Xommunalbanken AS has no branches.	20 a		
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to the answers in this section.  Kommunalbanken AS has no branches.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 e CDD Yes  22 g Independent Testing Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Pel Screening Yes  22 l Pel Screening Yes  22 l Pel Screening Yes  22 k Risk Assessment Yes			
to the answers in this section.  Kommunalbanken AS has no branches.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 e CDD Yes  22 g Independent Testing Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Pel Screening Yes  22 l Pel Screening Yes  22 l Pel Screening Yes  22 k Risk Assessment Yes			
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3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 A Appointed Officer with sufficient experience/expertise  22 b Adverse Information Screening  Yes  22 c Beneficial Ownership  Yes  22 d Cash Reporting  Yes  22 d Cash Reporting  Yes  22 f EDD  Yes  22 f EDD  Yes  22 g Independent Testing  Yes  22 h Periodic Review  Yes  22 i Policies and Procedures  Yes  22 j PEP Screening  Yes  22 k Risk Assessment  Yes		to the answers in this section.	
Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 h Periodic Review Yes  22 i Policies and Procedures Yes  22 j PEP Screening Yes  22 k Risk Assessment Yes			Kommunaidanken AS has no branches.
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Following components:   Yes   Appointed Officer with sufficient experience/expertise   Yes	22		
following components:           22 a         Appointed Officer with sufficient experience/expertise         Yes           22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 l         Policies and Procedures         Yes           22 l         PEP Screening         Yes           22 k         Risk Assessment         Yes		AML, CTF and Sanctions standards regarding the	
22 a         Appointed Officer with sufficient experience/expertise         Yes           22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 a		Yes
22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 g		Yes
22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes		Periodic Review	
22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes			
22 k Risk Assessment Yes			
ZZ I GRIGIOTO			
	44 1	Janul0()5	155



22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	
	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
24	least annually by the Board or equivalent Senior	
		Yes
	Management Committee? If N, describe your practice in	
	Question 29	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Kommunalbanken AS has no branches.
4. ANTI BR	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
••	consistent with applicable ABC regulations and	
		Yes
	requirements to reasonably prevent, detect and report	
-	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
-	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
-	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	1.33
34	is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	TVOT Applicable
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding	NI-
	interaction with public officials?	No
35 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
	outer policy applicable to the Legal Entity)?	Part
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	Yes
	Does the Board receive, assess, and challenge regular	
	reporting on the status of the ABC programme?	Yes
	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
		l l
38 a	If N, provide the date when the last ABC EWRA was	
30 a		l I
	completed.	l l
1		· I
		l l
39	Does the Entity have an ABC residual risk rating that is	
		Vos
		Yes
	inherent risk assessment?	
	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and other	No
	tnird-party providers as appropriate	110
40 b	Corruption risks associated with the countries and	
		Yes
	or through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Vec I
		160
	public officials	
40 d	Commission risks associated with aite and harm's it	
40 d	Corruption risks associated with gifts and hospitality,	v <sub>e</sub> -
40 d	hiring/internships, charitable donations and political	Yes
40 d		Yes

40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other	
7.	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	Yes
		Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	No
44	specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section	
44.	are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Kommunalbanken AS has no branches.
	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
	annually?	Yes
48	Has the Entity chosen to compare its policies and	
	procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for	
49 c	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	
	banking services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	
49 e	Prohibit dealing with another entity that provides services to shell banks	
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
40 a		
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	
	exchanges houses, casa de cambio, bureaux de	
40 h	change or money transfer agents	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Yes
	associates	Tes



49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
40 :	employees	
49 j	Define the process, where appropriate, for	Man
	terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
491	Define the process and controls to identify and	
	handle customers that were previously exited for	Was .
	financial crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	Van
	sanctions, PEPs and Adverse Media/Negative News	Yes
49 п	Outline the processes for the maintenance of internal	Yes
	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
51 a	comply with applicable laws?  If Y, what is the retention period?	
əıa	is 1, what is the retendon period?	
		5 years or more
		7
52	Confirm that all responses provided in the above Section	
PA .	are representative of all the LE's branches	
52 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	Kommunalbanken AS has no branches.
		Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.
		Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.
6. AML, C		Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.
		Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.
	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.  Yes
54	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client	
54 a 54 b 54 c	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product Channel	Yes
54 a 54 b 54 c 54 d	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product Channel Geography	Yes Yes
54 a 54 b 54 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes Yes
54 a 54 b 54 c 54 d 55	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 55	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 a	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product  Channel  Geography  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  Transaction Monitoring  Customer Due Diligence	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 a 55 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 b 65 c 55 d	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diliigence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 55 a 55 c	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 c 55 c 55 a 55 c 55 c 55 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AMI & CTF EWRA been completed in	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 f 55 f 55 h	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AMI & CTF EWRA been completed in	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 f 55 f 55 h	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
54 a 54 b 54 c 54 d 55 d 55 b 55 b 55 c 55 d 55 f 55 g 55 h 56	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 a 54 b 54 c 54 d 55 d 55 b 55 b 55 c 55 d 55 f 55 g 55 h 56	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 d 55 b 55 b 55 c 55 d 55 f 55 g 55 h 56	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 a 54 b 54 c 54 d 55 c 55 a 65 c 55 d 55 d 55 d 55 d 55 d 55 d 55 6 6 6 6	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 c 54 d 55 d 55 b 55 b 55 c 55 d 55 f 55 g 55 h 56	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 c 54 d 55 65 c 65 c 65 c 65 c 65 6 a 6	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 a 54 b 54 c 54 d 55 c 55 a 65 c 55 d 55 d 55 d 55 d 55 d 55 d 55 6 6 6 6	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b 54 c 54 d 55 c 55 b 55 c 55 d 55 d 55 c 55 d 5	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 c 55 a 655 c 55 d 55 b 56 56 a 57 56 a 57 b 57 c 57 c 57 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below; Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 d 55 c 65 f 55 d 55 5	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 a 54 a 54 b 54 c 54 d 55 5 a 55 b 65 c 55 d 55 b 65 c 55 d 55 c 65 c 65 c 65 c 65 c 65 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 a 54 a 54 b 54 c 54 d 55 5 a 55 b 65 c 55 d 55 b 65 c 55 d 55 c 65 c 65 c 65 c 65 c 65 c	TF & SANCTIONS RISK ASSESMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes



E0 -	Nama Caracaia	M
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
•••	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
-		
61	If appropriate, provide any additional information/context	
	to the answers in this section.	Karrana Barrian AO har an harabar
		Kommunalbanken AS has no branches.
7 KYC	CDD and EDD	
	Does the Entity verify the identity of the customer?	Yes
62 63	Do the Entity's policies and procedures set out when	100
00	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	100
64	Which of the following does the Entity gather and retain	
04	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b		
	Expected activity Nature of business/employment	Yes
64 c		Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied	As per Negrociae AMI population 1000/ of all beneficial surpose (abusing law)
	to beneficial ownership identification?	As per Norwegian AML regulation 100% of all beneficial owners (physical persons) have to be identified
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	165
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2		Yes
67 a3		Yes
67 a4		Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Customers own internal controls
60	For high right man individual austrance to a star 1.5	
68	For high risk non-individual customers, is a site visit a	No
60.0	part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
60	Does the Entity have a risk based approach to screening	
69		Vac
	customers for Adverse Media/Negative News?	Yes
60 2	If V is this at:	
69 a	If Y, is this at:	Vac
69 a 69 a1 69 a2	Onboarding	Yes Yes



69 a3		
	Trigger event	Yes
70	What is the method used by the Entity to screen for	
10		Combination of automated and manual
	Adverse Media/Negative News?	
71	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
	uley are FEFS, or controlled by FEFS?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	
	The same and the s	Automated
73	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	
	from screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
	PEPs?	
74	Is KYC renewed at defined frequencies based on risk	
14		Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	The state of the s	
	D 4 F 6 - 111 - 1 - 1	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
	1 1 33	
76	From the list helpsy which estagasing of systematics	
10	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?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Do not have this category of customer or industry
		Botherhave this category of customer of industry
76 b1	If EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	Do not have this category of customer or industry
76 g	Marijuana-related Entities	
		Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	EDD on risk-based approach
76 ]		
		EDD on risk-based approach
76 k	Non-resident customers	Do not have this category of customer or industry
76 I		
	Nuclear power	Do not have this category of customer or industry
76 m	Nuclear power Payment Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n	Nuclear power Payment Service Providers PEPs	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 m	Nuclear power Payment Service Providers PEPs	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 m 76 n 76 o	Nuclear power Payment Service Providers PEPs PEP Close Associates	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach
76 m 76 n 76 o 76 p	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 m 76 n 76 o 76 p 76 q	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  EDD on risk-based approach  EDD on risk-based approach  Do not have this category of customer or industry
76 m 76 n 76 o 76 p	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 m 76 n 76 o 76 p 76 q 76 r	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  EDD on risk-based approach  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry
76 m 76 n 76 o 76 p 76 q 76 r 76 s	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 m 76 n 76 o 76 p 76 q 76 r 76 s	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry
76 m 76 n 76 o 76 p 76 q 76 r 76 s	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach
76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t	Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry
76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u	Nuclear power Payment Service Providers PEPs PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry
76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 g 76 g 76 s 76 t 76 t 76 v 76 v 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  EDD on risk-based approach  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry  Do not have this category of customer or industry
76 m 76 n 76 o 76 g 76 g 76 s 76 t 76 t 76 v 76 v 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 w	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 g 76 g 76 s 76 t 76 t 76 v 76 v 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 g 76 g 76 s 76 t 76 t 76 v 76 v 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 g 76 g 76 s 76 t 76 t 76 v 76 v 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 q 76 r 76 s 76 s 76 s 76 s 76 w 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 g 76 g 76 s 76 t 76 t 76 v 76 v 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 q 76 r 76 s 76 s 76 s 76 s 76 w 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
76 m 76 n 76 o 76 q 76 r 76 s 76 s 76 s 76 s 76 w 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry
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76 m 76 n 76 o 76 q 76 r 76 s 76 s 76 s 76 s 76 w 76 v	Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)  If restricted, provide details of the restriction	Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry EDD on risk-based approach Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry



CBDDQ V1.4

70 -	If V indicate who are idea the accretion	Daytachusting
78 a 79	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
0.4	review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section	
04 -	are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Kommunalbanken AS has no branches.
	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
		Yes
84	of suspicious activity?	
64	What is the method used by the Entity to monitor	Combination of automated and manual
84 a	transactions for suspicious activities?  If manual or combination selected, specify what type	
04 a		
	of transactions are monitored manually	Non-invoiced incoming payments to Kommunalbanken AS bank account held at a nordic bank.
		The invoiced incoming payments to Normanai banker AS bank account field at a nortice bank.
84 b	If automated or combination selected, are internal	Both
	system or vendor-sourced tools used?	Doll
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	27.00
		STACC Quesney - Construo, Roaring, Retriever
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	
	application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report	Yes
	suspicious transactions?	res
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	
	reporting requirements?	
86	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
		Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
		Yes
•	timely manner?	
89	Does the Entity have processes in place to send	
		Yes
20	timely manner?	
90	Confirm that all responses provided in the above Section	
90 a	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	
	and the prantitives that this applies to	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Kommunalbanken AS has no branches.
DAME-	NT TRANSPARENCY	
PAYME		
PAYME 2	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	



		Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	No
93 b	Local Regulations	No
93 b1	If Y, specify the regulation	
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border	
96	payments?  Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	Kommunalbanken does not execute any wire transfers or payments on behalf of its customers.
10. SANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	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)?	
100	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?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	STACC Quesney - Construo, Roaring
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	< 1 year
103	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
104		Automated
05	Does the Entity have a data quality management	Yes
	Select the Sanctions Lists used by the Entity in its	
06	canations corponing	
06 a	sanctions screening processes: Consolidated United Nations Security Council	Used for screening customers and beneficial owners (i.e. reference data)
	Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasure's Office of	Used for screening customers and beneficial owners (i.e. reference data)  Used for screening customers and beneficial owners (i.e. reference data)



106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	and the state of t
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section,	
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b		Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	

-		
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	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, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	
123	Does the internal audit function or other independent	
123 a	third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 b	procedures Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
44 EDALIS		
14. FRAUI 127	Does the Entity have policies in place addressing fraud	Yes
128	Does the Entity have a dedicated team reconcible for	No



129	Does the Entity have real time monitoring to detect fraud?	No
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	
131	Confirm that all responses provided in the above section	
131 a	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.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement  Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)		
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)  Kommunalbanken AS (Financial Institution name) is fully committed to the fight against financial crime and makes		
every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, EGIL STRYSSE (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I, ILSE BACHE		
complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.  (Signature & Date)		
(Signature & Date)  (Signature & Date)  (Signature & Date)		