#### the Wolfsberg Group

Financial Institution Name: Location (Country):

Kommunalbanken AS	
Norway	

The questionnaire is required to be arswered 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. If 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 insteading different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	ifferent than its Entity Head Office, a separate questionnaire can be complete  Question	Answer
_	TY & OWNERSHIP	Answer
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	
•		Filipstad Brygge 1
		0252 Oslo, Norway
	E 11 D 1 D 1 D 1 D 1 D 1 D 1 D 1 D 1 D 1	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
		01.11.1999
6	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
Dai	symbol	
	Symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
		0 %
8	Does the Entity, or any of its branches, operate under an	
•	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
•	Dans the Dank have a Matural Dank Harris and	
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels?  Name of primary financial regulator/supervisory authority	
10	Traine of phinary infancial regulator/supervisory authority	
		The Financial Supervisory Authority of Norway
		,yy
11	Provide Legal Entity Identifier (LEI) if available	
		I7ETN0QQO2AHZZGHJ389
		II E HYUQQUZARZZÜRIJOOV
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	Lord distance files and the second of the se	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	Norway, Office of the Auditor General of Norway
		itolitay, Olico of the Additor Gelieral of Holiway
14	Select the business areas applicable to the Entity	
4 4 a 4 b	Retail Banking	No No

14 c		
	O THINK THE TANK	No
14 d	V	No
14 e	mire de differences	No .
14 f	1 11 11 11 11 11 11 11 11 11 11 11 11 1	No
14 g	Coccinios Corvictor Guerraly	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	Kommunalbanken AS holds a license as a 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 where loans are 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
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No 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
	to the answers in this section.	
2. PRODU	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:	
2. PRODU	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking	norwegian banks when conducting business with Kommunalbanken AS
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2. PRODU 19 19 a 19 a	to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	norwegian banks when conducting business with Kommunalbanken AS
2. PRODU 19 19 a 19 a 19 a1 19 a1a	to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with	norwegian banks when conducting business with Kommunalbanken AS
2. PRODU 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	norwegian banks when conducting business with Kommunalbanken AS
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2. PRODU 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1d 19 a1f 19 a1f	to the answers in this section.  JCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No
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	B	
19 a11	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	•
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
	Low Price Securities	
<b>19</b> g		No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
191	rayment services to non-parix entities wito may then	
	offer third party payment services to their customers?	No
		140
19 I1	If V places select all that annuly below?	
	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 15	Other - Please explain	
1010	Otrici - Ficase explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
19 o	Virtual Assets	No
		140
19 p	For each of the following please state whether you	
•	offer the service to walk-in customers and if so, the	
//	applicable level of due diligence:	15등 하면 없는 12 전 12
19 p1	Check cashing service	No
19 p1a	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	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
	if yes, state the applicable level of due diligence	
19 p4a	ii yee, etate the applicable foreit of add diligoriou	
19 p4a 19 p5	If you offer other services to walk-in customers	
	If you offer other services to walk-in customers please provide more detail here, including	
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19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	No
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19 p5  19 q  20  20 a  21  3. AML, C7  22 a	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  FF & 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	No No branches  Kommunalbanken AS has no branches.
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19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 d  22 e  22 f  22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  F. & 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 Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 d  22 e  22 f  22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  F. & 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 Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  3. AML, CT  22 b  22 c  22 c  22 c  22 c  22 g  22 p  22 p	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  F & 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 Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 c  22 f  22 g  22 h  22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  F. & 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 Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing Periodic Review Policies and Procedures	No  No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 c  22 f  22 g  22 h  22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  F. & 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 Adverse Information Screening Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing Periodic Review Policies and Procedures	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 d  22 c  22 f  22 g  22 h  22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 d  22 f  22 g  22 h  22 i  22 j  22 k	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 d  22 c  22 f  22 g  22 h  22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  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.  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.  F. & 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 Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening  Risk Assessment	No No branches  Kommunalbanken AS has no branches.  Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

22 m	Suspicious Activity Reporting	Yes
22 n		Yes
22 o		Yes
23	I to the first control of the Catholo Abdi	
20	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least appliedly by the Board or equivalent Senior	Was .
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
		Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
00 -	· ·	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	O 5 th - t - II and a serious ded in the above Costion	M. A. Carachara
20	are representative of all the LE's branches	No branches
28 a	If N, clarify which questions the difference/s relate to	
20 4	and the branch/es that this applies to.	
	and the branchies that the applies to.	
	A Company of the Comp	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	Maria de AO has no hasankas
		Kommunalbanken AS has no branches.
	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	L.
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
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	No
	interaction with public officials?	
35 c	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
	D 0 5.0 b	
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular	Yes
	reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
30 a	completed.	
	oomprotou.	
39	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
	Does the Entity's ABC EWRA cover the inherent risk	
40		
40	components detailed below:	
40 40 a	Potential liability created by intermediaries and other	No.
	Potential liability created by intermediaries and other third-party providers as appropriate	No
40 a	Potential liability created by intermediaries and other	No
	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly	
40 a 40 b	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those	Yes
40 a 40 b	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or	Yes
40 a 40 b	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities of public officials	Yes
40 a 40 b	Potential liability created by intermediaries and other third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries  Transactions, products or services, including those that involve state-owned or state-controlled entities or	Yes

40 e	01	
70 0	Changes in business activities that may materially	Yes
4.4	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	
	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	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	Not Applicable
	subject to ABC risk have been outsourced	1.001 pp.10010
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes
43	Does the Entity provide ABC training that is targeted to	
-10	specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No 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.	L
		Kommunalbanken AS has no branches.
E ABAI	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
40 -		Vee
46 a	Money laundering	Yes
46 b	Money laundering Terrorist financing	Yes
46 b 46 c	Money laundering Terrorist financing Sanctions violations	
46 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least	Yes
46 b 46 c 47	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes Yes
46 b 46 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes
46 b 46 c 47 48	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes
46 b 46 c 47 48	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes
46 b 46 c 47 48 48 a 48 a1	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that:	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 48 b 48 b 49 a 49 b	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBF is	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 a	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU standards If Y, does the Entity retain a record of the results? Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 c 49 d	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 48 b 49 b 49 c	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unicensed banks and/or NBF is Prohibit dealing with other entities that provide banking services to unicensed banks Prohibit decounts/relationships with shell banks Prohibit dealing with nother entity that provides	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 49 a 49 b 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit decling with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provides services to shell banks	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 48 b1 49 a 49 c 49 d	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 b 49 a 49 b 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards Obes the Entity retain a record of the results? Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? EU Standards Obes the Entity retain a record of the results? Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a1 48 b 49 b 49 c 49 c 49 d 49 e	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes Yes Yes No
46 b 46 c 47 48 48 a 48 a 48 a 49 b 49 c 49 c 49 d 49 e 49 f 49 g	Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents Assess the risks of relationships with domestic and	Yes Yes Yes No

issues/potentially suspicious activity identified by employees Yes			
Define the process. where appropriate, for symmetry residentifying due to process to cotting cleants for framerial continue residentifying due to the process for cotting cleants for framerial continue resources for cotting cleants for framerial continue resources the centry inciding the process for cotting cleants for framerial continue resources the centry inciding the process for continue resources that process for the maintenance of the process for the maintenance of the maintenance of the resources that process for the maintenance for maintenance resources that process for the maintenance of the process for the maintenance of the process for the maintenance of the maintenance of the resources for the process for the maintenance of the process for the proces	49 i	issues/potentially suspicious activity identified by	Yes
de la communicación del communicación del communicación de la communicación del communicación de la communicación de la communicación del communicación de la communicación del commun	49 j	Define the process, where appropriate, for terminating existing customer relationships due to	Yes
About the customers that were previously order of financial crime reasons if they seek to re-establish a handle customers that were previously order of financial crime reasons if they seek to re-establish a financial crime reasons if they seek to re-establish a financial crime reasons if they seek to re-establish a financial crime reasons if they seek to re-establish a financial crime reasons if they seek to re-establish a financial crime reasons if they seek to re-establish a financial crime reasons if they seek to re-establish a financial crime reasons in the reasons of them and the complete of the maintenance of terman financial crime the complete of the maintenance	49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including	Yes
49 m Outline the processes regarding screening for sanctions, PEPs and Adverse Medial Negletine News 49 n Outline the processes for the maintenance of internal Paracitation of the Entity and technical as risk boundary around the business?  15	49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a	Yes
Hes the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?  Domit vettil applicable laws?  If y, what is the retention period?  2 Confirm that all responses provided in the above Section are representative of all the LE's transhes  2 Confirm that all responses provided in the above Section are representative of all the LE's transhes  3 If appropriate, provide any additional information/context to the answers in this section.  3 If appropriate, provide any additional information/context to the answers in this section.  4 Ref. question 48- Nonvegian AML & CTF Senction regulations are based on EU regulations. Ref. question 49- 49; Kommunabhanken does not hold a bank license nor bank accounts for clients  5 AML, CTF & SANCTIONS RISK ASSESSMENT  5 Ab Conditional Section of the CTF Senction regulations are based on EU regulations. Ref. question 49- 49; Kommunabhanken does not hold a bank license nor bank accounts for clients  5 Ab Conditions Section before the inherent manner of the conditions are based on EU regulations. Ref. question 49- 49; Kommunabhanken does not hold a bank license nor bank accounts for clients  5 Ab Conditions Section before  5 Ab Conditions Section Section before  5 Ab Conditions Section Secti	49 m	Outline the processes regarding screening for	Yes
Has the Entity defined and six loterance statement or simaler occurrent which defines a risk boundary around their business?   Does the Entity have record retention procedures that common the Entity have record retention procedures that common their procedures of the Entity have record retention period?   Syears or more	49 n		Yes
Confirm that all responses provided in the above Section are restresentative of all the LES branches	50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around	Yes
52 a Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a If N, clarify which questions the difference/s relate to and the branch/se that this septiles to the enswers in this section.  53 If appropriate, provide any additional information/context to the enswers in this section.  64 If appropriate, provide any additional information/context to the enswers in this section.  65 AML, CTF & SANCTIONS RISK ASSESMENT  64 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below.  54 Octavity 54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below.  55 C Chamel 56 Does the Entity's AML & CTF EWRA cover the controls efficiences components detailed below.  58 A Transaction Monitoring 58 B C Customer Due Diligence 58 C PEP Identification 58 C Transaction Monitoring 58 C Name Screening against Adverse Media/Negative Nes 59 C Name Screening Adverse Media/Negative Nes 59 C Name Screening Adverse Media/Negative Nes 59 C Name Screening Adverse Media/	51	Does the Entity have record retention procedures that	Yes
Confirm that all responses provided in the above Section are representative of all the LE's branches  if N, clarity which questions the difference's relate to and the branch's that this applies to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  Ref. question 45. Norwegian AML & CTF Sanction regulations are based on EU regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations are based on EU regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations are based on EU regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations are based on EU regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations are based on EU regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations are based on EU regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulation regulations. Ref. question 45. Norwegian AML & CTF Sanction regulations. Ref. question 45. Norwegian AML & CTF Sanction regulation regulations. Ref. question 45. Norwegian AML & CTF Sanction regulation regulations. Ref. question 45. Norwegian AML & CTF Sanction regulation regulation regulation regulation regulation regulation regulation regulation regulation	51 a		· ·
are representative of all the LFs 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.  Ref. question 48: Norwegian AML & CTF SanCtion regulations are based on EU regulations. Ref. question 48-49g: Kommunalbanken does not hold a bank license nor bank accounts for clients    Communalbanken does not hold a bank license nor bank accounts for clients			5 years or more
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	52		No branches
to the answers in this section.  Kommunalbanken As has no branches. Ref. question 489-49g; Kommunalbanken does not hold a bank license nor bank accounts for clients  6. AML, CTF & SANCTIONS RISK ASSESSMENT  54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below;  54 a Client Yes  54 b Product Yes  54 d Channel Yes  55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below;  55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below;  55 L Customer Due Diligence Yes  55 L Customer Due Diligence Yes  56 L Transaction Screening Yes  57 L Training and Education Yes  58 G Governance Yes  58 J HN, provide the date when the last AML & CTF  EWRA was completed in the last 12 months?  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below.  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below.  59 Does the Entity's Does Dilligence Yes  59 Does the Entity's Does Dilligence Yes  50 List Management Information Yes  51 List Management	52 a	If N, clarify which questions the difference/s relate to	
Does the Entity's AMIL & CTF EWRA cover the inherent risk components detailed below.	53		Ref. question 46: Norwegian AML & CTF Sanction regulations are based on EU regulations.
Does the Entity's AMIL & CTF EWRA cover the inherent risk components detailed below.		The second play too poolities	
risk components detailed below:   Yes			
Section	54		
54 c Channel Yes 54 d Geography 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring 55 b Customer Due Diligence Yes 55 c PEP Identification Yes 55 d Transaction Screening 55 d Transaction Screening 55 e Name Screening against Adverse Media/Negative News 55 f Training and Education Yes 56 h Management Information Yes 56 h Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 c Channel Yes 58 Does the Entity's Sanctions EWRA cover the ontrols effectiveness components detailed below: 58 Customer Due Diligence Yes 58 Customer Due Diligence Yes 58 List Management Yes	54 a		
Section			
55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below.  55 a Transaction Monitoring Yes 55 b Customer Due Diligence Yes 55 c PEP Identification Yes 55 d Transaction Screening Yes 55 d Transaction Screening Yes 55 e Name Screening against Adverse Media/Negative News 55 f Training and Education Yes 55 g Governance Yes 55 g Governance Yes 55 h Management Information Yes 56 h Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 b Product Yes 57 b Product Yes 57 d Geography Yes 58 Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Pyes 58 c List Management Pyes 58 c List Management Pyes			
Transaction Monitoring   Yes		Does the Entity's AML & CTF EWRA cover the controls	Yes
SEC   PEP Identification   Yes	55 a	Transaction Monitoring	
Transaction Screening   Yes			
Name Screening against Adverse Media/Negative News   Yes			
Training and Education   Yes		Name Screening against Adverse Media/Negative	
State			Voc
Management Information   Yes			
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.  To bee the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Client Yes  Client Yes  Product Yes  Channel Yes  Channel Yes  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  Yes  To Channel Yes  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  Expression Sanctions EWRA cover the controls effectiveness components detailed below:  Yes  List Management Yes  List Management Yes			
If N, provide the date when the last AML & CTF EWRA was completed.  To Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  To a Client Yes To b Product Yes To Channel Yes To Geography Yes  Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  To a Client Yes To Channel Yes To Channel Yes To Geography Yes To Geography Yes To Geography Yes To Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  To Sa Customer Due Diligence Yes To Sa Customer Due Diligence Yes To Sa Customer Lieut Management Yes		Has the Entity's AML & CTF EWRA been completed in	
Tisk components detailed below:   Yes	56 a	If N, provide the date when the last AML & CTF	
57 a         Client         Yes           57 b         Product         Yes           57 c         Channel         Yes           57 d         Geography         Yes           58         Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:         Yes           58 a         Customer Due Diligence         Yes           58 b         Governance         Yes           58 c         List Management         Yes	57		
57 b         Product         Yes           57 c         Channel         Yes           57 d         Geography         Yes           58         Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:         Yes           58 a         Customer Due Diligence         Yes           58 b         Governance         Yes           58 c         List Management         Yes	57 a		
57 c     Channel     Yes       57 d     Geography     Yes       58     Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:       58 a     Customer Due Diligence     Yes       58 b     Governance     Yes       58 c     List Management     Yes		Product	
57 d     Geography     Yes       58     Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:       58 a     Customer Due Diligence     Yes       58 b     Governance     Yes       58 c     List Management     Yes			
Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  Se a Customer Due Diligence Yes Governance Yes List Management Yes			Yes
58 b         Governance         Yes           58 c         List Management         Yes	- 10	effectiveness components detailed below:	
58 c List Management Yes			

-	N	To the state of th
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
		Yes
<b>58</b> g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	The completed	
60	Confirm that all responses provided in the above Section	
00		'
	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.	
	and the branchies that this applies to.	
04	16	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
		Kommunalbanken AS has no branches,
		Tomarabamon 76 has no planetos.
7 KYC C	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
50		Mas
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
Q.A		STEAKS SUICE OF STREET HIS DOCUMENT OF STREET PROPERTY OF STREET STREET STREET, STREET
64	Which of the following does the Entity gather and retain	경기가 되었다면 되었다면 하는데 하는데 보고 있다. 그는 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 ପ	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
		163
65 d	Other relevant parties	
66	What is the Entity's minimum (lowest) threshold applied	As per Norwegian AML regulation all beneficial owners (physical persons) have to be identified in line with
00		
	to beneficial ownership identification?	guidelines from The Financial Supervisory Authority of Norway
67	Does the due diligence process result in customers	V
-	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
07.4		Was a
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
		169
67 a6	Other (specify)	
	1 27	
		Customers own internal controls and relevant quidelines
		Customers own internal controls and relevant guidelines
		, " $\sim$ 1
60	For high risk non-individual customers, is a site visit a	
68		No I
	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"	
		I
		I
		I
		I
69	Dogs the Entity have a rick hand approach to server in	
02	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
	HAVE ALL A	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes



769 a			
Adverse Media/Negativo Newa?  7 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or combined by PEPs?  71 a			Yes
Adverse Media/Negative News?  To Does the Entity have a rask based approach to screening customers and connected parties to determine whether they are PEPs, or combined by PEPs?  Ti at If Y, is this at:  Ti at Onboarding Yes  Ti at KYC renewal Yes  What is the method used by the Entity to screen PEPs?  What is the method used by the Entity to screen PEPs?  What is the method used by the Entity to screen PEPs?  To Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by Yes  Ti as Trigger event at defined frequencies based on risk rating (Person Chewers)?  Ti as If Yes, select all that apply.  Ti at If Yes, select all that apply.  Ti at I - 2 years Yes  Ti as Syears or more  Ti age or were the entity maintain and report metrics on current and past periodic or ringger event due difigence reviews?  Ti as Other (Pease specify)  To Does the Entity maintain and report metrics on current and past periodic or ringger event due difigence reviews?  To Bo Respondent Banks  Do not have this category of customer or industry  Ti b Respondent Banks  Correspondent Banks  Do not have this category of customer or industry  Ti b Respondent Banks  Do not have this category of customer or industry  Ti b MSBM/TS customers  To Bo Non-resident customers  Do not have this category of customer or industry  Ti b Nuclear power  Ti b Nuclear power  To not have this category of customer or industry  Ti b Nuclear power  To not have this category of customer or industry  Ti b Nuclear power  To not have this category of customer or industry  Ti b Nuclear power  To not have this category of customer or industry  Ti b Nuclear power  To not have this category of customer or industry  Ti b Nuclear power  To not have this category of customer or industry  Ti b Nuclear power  To not have this category of customer or industry  To not have this category of customer or industry  Ti b Nuclear power  To not have this			Combination of automated and manual
Obes the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  71 a	/	Adverse Media/Negative News?	OSTRONIAGON OF GATOMIREO WITH THATMAN
they are PEPs, or controlled by PEPa?  If y is this at:  71 at Onboarding  Yes  71 at Onboarding  Yes  Tris S Trigger event  What is the method used by the Entity to screen PEPa?  What is the method used by the Entity to screen PEPa?  To Does the Entity have policies, procedures and processes to review and escalate potential matches processes to review and escalate processes and processes a	71	Does the Entity have a risk based approach to screening	
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Fig. 2			Tes
71 a2 KYC enewal Yes 71 a2 KYC enewal Yes 72 What is the method used by the Entity to screen PEPS? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPS? 74 Entitle Periodic Reviews? 75 Is KYC enewed at defined frequencies based on risk periodic Reviews? 76 Is KYC enewed at defined frequencies based on risk periodic Periodic Reviews? 77 As 1 Less than one year 78 Is Less than one year 78 Is September of the periodic Reviews? 79 If yes, select all that apply. 79 If yes, select all that apply. 70 In the periodic Periodic Reviews? 71 As 3 3-4 years 70 Yes 71 As 3 3-4 years 71 As 3 3-4 years 72 Yes 73 As 5 years or more 74 As 6 Other (Please specify) 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due difigence reviews? 76 From the list below, which categories of customers or industries are subject to EDD andor are restricted, or prohibited by the Entity's FCD programme? 76 A Arma Semantial Reviews Are 5 Periodic Reviews Periodic Reviews Are 5 Periodic Reviews Periodic Rev		,	
71 a2 KYC enewal Yes 71 a2 KYC enewal Yes 72 What is the method used by the Entity to screen PEPS? 73 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPS? 74 Entitle Periodic Reviews? 75 Is KYC enewed at defined frequencies based on risk periodic Reviews? 76 Is KYC enewed at defined frequencies based on risk periodic Periodic Reviews? 77 As 1 Less than one year 78 Is Less than one year 78 Is September of the periodic Reviews? 79 If yes, select all that apply. 79 If yes, select all that apply. 70 In the periodic Periodic Reviews? 71 As 3 3-4 years 70 Yes 71 As 3 3-4 years 71 As 3 3-4 years 72 Yes 73 As 5 years or more 74 As 6 Other (Please specify) 75 Does the Entity maintain and report metrics on current and past periodic or trigger event due difigence reviews? 76 From the list below, which categories of customers or industries are subject to EDD andor are restricted, or prohibited by the Entity's FCD programme? 76 A Arma Semantial Reviews Are 5 Periodic Reviews Periodic Reviews Are 5 Periodic Reviews Periodic Rev	71 a	If Y is this at:	
71 a2			Yes
Trager event to the method used by the Entity to screen PEPs?  What is the method used by the Entity to screen PEPs?  Combination of automated and manual  Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  FEPs?  Ta is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  Ta at It less than now year Nes 1 to 1 to 2 years Yes 1 to 3 to 4 years Yes 1 to 3 to 4 years Yes 1 to 3 to 4 years Yes 1 to 4 to			
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processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  74	12	What is the method used by the Entity to screen FEFs?	Combination of automated and manual
processes to freview and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  74 a 1 KYC renewed at defined frequencies based on risk raining (Pertodic Reviews)?  74 a 1 Less than one year No  74 a 2 1 – 2 years Yes  74 a 3 3 – 4 years Yes  74 a 3 3 – 4 years Yes  74 a 6 Syears or more  74 a 6 Other (Please specify)  75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?  76 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 Arms, defence, military  76 Does the Entity FCC programme?  77 a Arms, defence, military  78 a Carescondent Banks  78 b Respondent Banks  79 b Respondent Banks  70 c Correspondent Banks  70 c Correspondent Banks  71 a Correspondent Banks  72 a Correspondent Banks  73 a Correspondent Banks  74 a Correspondent Banks  75 a Correspondent Banks  76 a Correspondent Banks  77 a Correspondent Banks  78 a Correspondent Banks  79 a Correspondent Banks  70 a Correspondent Banks  70 a Correspondent Banks  70 a Correspondent Banks  70 a Correspondent Banks  71 a Correspondent Banks  72 a Correspondent Banks  73 a Correspondent Banks  74 a Correspondent Banks  75 a Correspondent Banks  76 a Correspondent Banks  77 a Correspondent Banks  78 a Correspondent Banks  79 a Correspondent Banks  70 a Correspondent Banks  71 a Correspondent Banks  72 a Correspondent Banks  73 a Correspondent Banks  74 a Correspondent Banks  75 a Manuan-related Entities  75 a Correspondent Banks  76 a Correspondent Banks  77 a Correspondent Banks  78 a Correspondent Banks  79 a Correspondent Banks  70 a Corr	73	Does the Entity have policies procedures and	
from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  74			
determine whether they are PEPs, or controlled by PEPs?  74 a 1s KYC renewed at defined frequencies based on risk raining (Pertodic Reviews)?  74 a 1			Yes
PEPS    A   S KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?   74 a   If yes, select all that apply.			
Table   St K'C renewed at defined frequencies based on risk rating (Periodic Reviews)?			
reting (Pendic Reviews)?  74 a 1			
174 at   If yes, select all that apply:			Yes
Table   Less than one year   No			
74 a2 1 - 2 years Yes 74 a3 3 - 4 years Yes 74 a4 5 years Other (Please specify)  75 Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?  76 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 Ams, defence, military 76 b Respondent Banks 76 b1 If EDD or restricted, does the EDD assessment contain the elements as set out in the Worlbard Contains the elements as set out in the Worlbard Correspondent Banks Do not have this category of customer or industry  76 c Embassies/Consulates 76 d Extractive industries 76 a Gambling customers 77 d Gambling customers 78 d Extractive industries 79 Do not have this category of customer or industry 79 Do not have this category of customer or industry 70 Do not have this category of customer or industry 70 Do not have this category of customer or industry 71 Do not have this category of customer or industry 72 Do not have this category of customer or industry 73 Do not have this category of customer or industry 74 Do not have this category of customer or industry 75 Do not have this category of customer or industry 75 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this category of customer or industry 76 Do not have this cat			No
74 a3			
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76 v   Unregulated charities   Do not have this category of customer or industry			
76 w Used Car Dealers Do not have this category of customer or industry 76 x Virtual Asset Service Providers Do not have this category of customer or industry 76 y Other (specify)			
76 x Virtual Asset Service Providers Do not have this category of customer or industry 76 y Other (specify)			
76 y Other (specify)			
			Do not have this category of customer or industry
	76 y	Other (specify)	
If a state of a social adults of the application		te constitute di constitute destable se constitutiva	
77 If restricted, provide details of the restriction	77	ir restricted, provide details of the restriction	
79. Deep EDD require senior business management and/or	70	Dans EDD require capier business management and/or	
78 Does EDD require senior business management and/or Yes	18		Yes
compliance approval?		[compliance approval?	

20-1-12-1-20-2		
78 a	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
81	review on clients subject to EDD?  Confirm that all responses provided in the above Section	
01	are representative of all the LE's branches	No branches
81 a	If N, clarify which questions the difference/s relate to	
٠	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
02	to the answers in this section.	
	to the district in the couldn't	Kommunalbanken AS has no branches.
	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	
	transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	New Serviced Security Community Services AS had a service Service Service AS had a service Ser
		Non-invoiced incoming payments to Kommunalbanken AS bank account held at a nordic bank.
84 b	If automated or combination selected, are internal	Both
	system or vendor-sourced tools used?	Doni
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	STACC Quesney - Construo, Roaring, Retriever
		51ACC Questiey - Constitut, Nothing, Nethever
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	< 1 year
	application last calibrated?	- Tyour
85	Does the Entity have regulatory requirements to report	Yes
85 a	suspicious transactions?  If Y, does the Entity have policies, procedures and	
03 a	processes to comply with suspicious transaction	Yes
	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	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	Yee
	Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send	
		Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	70 Diamonos
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	Kommunalbanken AS has no branches.
		TOTALINIANIANIANIANIANIANIANIANIANIANIANIANIA
	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
	Transparency Standards?	

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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 с	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 payments?	
96	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 hold accounts for clients and does not execute any wire transfers or payments on behalf of its customers.
10. SANC	TIONS	
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 beneficia 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: Are internal system of vendor-sourced tools used'	Wandar assessed tools
102 a1 102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	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	
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	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	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	
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	
400	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	No
	or G7 member countries have enacted comprehensive	NO .
	iurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	
109	are representative of all the LE's branches	No 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	
110	to the answers in this section.	
	to the different and society.	Kommunalbanken AS has no branches.
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	Identification and reporting of transactions to	Yes
	government authorities	
111 b	Examples of different forms of money laundering,	Yes .
	terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering,	
1116	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	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence Third parties to which specific FCC activities have	Yes
112 e	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,	
1.179	CTF and Sanctions staff?	Yes
114 a		Annually
115	Confirm that all responses provided in the shave Section	
	are representative of all the LE's branches	No branches

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115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchies that this applies to.	
	11	
116	If appropriate, provide any additional information/context	
110	to the answers in this section.	
		Kommunalbanken AS has no branches.
12. QUALITY	Y 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	Yes
119	independent Audit function)? Confirm that all responses provided in the above Section	
110	are representative of all the LE's branches	No 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	
120	to the answers in this section.	
		Kommunalbanken AS has no branches.
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,	Yes
	Fraud and Sanctions policies and practices on a regular	
400	basis?  How often is the Entity audited on its AML, CTF, ABC,	
122	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	
125 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies  Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes Yes
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
	- 1 - 1	
101	Assessment and in the form of the model of a system of a system of the s	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section	No branches
125 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	
120 d	and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context	
	to the answers in this section.	Kommunalbanken AS has no branches.
		Allien a limit of the limit of
14. FRAU	Does the Entity have policies in place addressing fraud	
127	Those are think have bolicles in blace addressing hadd	Yes
	risk?	103
128		No

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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 are representative of all the LE's branches	No branches
131 a	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.	Kommunalbanken AS has no branches.

#### **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 provide
in this Wolfsberg CBDDQ are complete and correct to my hone	est belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

ILSE BACHE (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are omplete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

8th 100 2024 (Signature & Date)