



**Giant Questionnaire V1.4  
in respect of Oberbank AG  
Compliance Policies, Procedures and Controls**

Oberbank Giant Questionnaire is an additional document for our filled-in Wolfsberg Questionnaires and gives extended information about the Compliance Policies, Procedures and Controls in regards of Anti-Money Laundering/ CTF und Sanctions. Furthermore, this Questionnaire includes information about Politically Exposed Person(s), Customers, High Risk Products, Countries & Sanctions, Documentation and Links.

Please note that you can find our latest Wolfsberg Questionnaire on our website [www.oberbank.com](http://www.oberbank.com) > [FI & Compliance Information](#). Further details like our Annual Reports, information about our Management and Shareholders are also published on this website.

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	Topic	Response	Response (continued)
<b>1. Institutional Information</b>			
1.	Financial institution's Name:		Oberbank AG
2.	Contact details Phone: Fax: E-mail:		+43 732 7802-0 +43 732 7858-18 <a href="mailto:office@oberbank.at">office@oberbank.at</a>
3.	SWIFT BIC		OBKLAT2LXXX
4.	Reuters Dealing		OBKL
5.	Official Website address		<a href="http://www.oberbank.com">www.oberbank.com</a> (English) <a href="http://www.oberbank.at">www.oberbank.at</a> (German)
6.	Company Registration number and name of the authorizing agency		FN 79063 w / State Court of Linz
7.	Issuing date of financial institution's license		24.10.2002
8.	Validity of license or certificate of legal incorporation/operation		Without time limit
9.	Ownership Structure: Names of the shareholders		There is no natural person who owns or controls directly or indirectly more than 10 % of Oberbank. Please find more information at <a href="https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a">https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a</a> and <a href="https://www.oberbank.com/oberbank-shares">https://www.oberbank.com/oberbank-shares</a>
10.	Information about the financial institution's Management Board		Mr. Franz Gasselsberger Management position: CEO & Chairman of the Management Board  Mr. Martin Seiter Management position: Member of the Management Board  Ms. Isabella Lehner Management position: COO & Member of the Management Board  Ms. Romana Thiem Management position: Member of the Management Board  Mr. Florian Hagenauer Management position: CRO & Member of the Management Board  Please find more information at <a href="https://www.oberbank.com/management">https://www.oberbank.com/management</a>
11.	Members of the Supervisory Board		Please find more information at <a href="https://www.oberbank.com/management">https://www.oberbank.com/management</a>



12.	Legal Representative		For general legal questions, please contact the head of Corporate Secretary & Communication department via <a href="mailto:sek@oberbank.at">sek@oberbank.at</a>
13.	Is the financial institution a subsidiary of another legal entity?	No	
14.	Is the financial institution a publicly traded company? If yes, which stock exchange(s) is the institution listed on? Include the institution's trading name	Yes	Vienna Stock Exchange OBS (ordinary shares)
15.	Reuters-Code for OBK shares at the Vienna Stock Exchange		OBER.VI (ordinary shares)
16.	Bearer shares		The shares of Oberbank are 100 % bearer shares, listed on the Vienna Stock Exchange and traded publicly. Issuing bearer shares is a common instrument for a public stock exchange listed company in order to ensure free tradability and to increase practicability. Transparency with respect of the examination of the ultimate beneficial owner is secured by law. There is no natural person who owns or controls directly or indirectly more than 10 % of Oberbank. Please find more information at <a href="https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a">https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a</a>
17.	Tax identification number		TIN 230/5236
18.	VAT number		ATU 2285 2606
19.	Global Intermediary Identification Number (GIIN)		E8HZCK.00000.LE.040

## 2. Business and Branches

20.	Scope of business (clearing correspondent bank is exempted)		Oberbank is a regional bank, following an universal banking concept. That means, Oberbank offers a wide range of ordinary products and services to private / retail clients as well as corporate customers in order to satisfy the demand of local and international business activities. Oberbank does not offer services to third party banks, like clearing payment transactions. In accordance with the regional principle, Oberbank focuses on companies in those countries, where we are represented or which companies have their headquarter in the EU or which belong to a member state of UNIDO.
21.	Non-scope of business		Oberbank's criteria of exemption of businesses can be found in our sustainability report. Please find more information at <a href="https://www.oberbank.com/en/sustainability">https://www.oberbank.com/en/sustainability</a> and <a href="https://www.oberbank.com/strategy-and-guidelines">https://www.oberbank.com/strategy-and-guidelines</a>



22.	Main business country or territory		The main business activities are focused on the domestic business in Austria, but since 1990, Oberbank's catchment area includes Germany, Czech Republic, Hungary and Slovakia too.
23.	Payment transactions within the catchment area		<p>Oberbank runs an extremely centralized business strategy in general and also in the field of payment transactions. In order to make transactions easier for the international partner banks, Oberbank offers all of them to use its headquarters in Linz as single entry point. Afterwards, Oberbank routes these transactions like trade finance, payments, etc. via internal channels from Linz to its branches and vice versa. At this point, it can be stated that Oberbank is NOT doing nested or downstream transactions.</p> <p>Please find more information at our Policy concerning Incoming and Outgoing Payment Transactions: <a href="https://www.oberbank.com/documents/20732/412157/ir_policy_payment_transactions.pdf/ebf8f522-ce4f-3876-d456-1d8a794ad1e1?t=1613654459257">https://www.oberbank.com/documents/20732/412157/ir_policy_payment_transactions.pdf/ebf8f522-ce4f-3876-d456-1d8a794ad1e1?t=1613654459257</a></p>
24.	Onboarding procedure of the financial institution		<p><b>Retail customers:</b> Valid and official ID Cards (e.g. passport or identity card with a photo – released from a state authority), verifying the truth of the provided ID; In most cases, the customer has to show his ID card personally; KYC Questionnaire is mandatory; Proof of origin for higher income amounts, general customer information for plausibility checks, there must be a regional relation to the respective market. For retail Austrian customers it is also possible to open an account online.</p> <p><b>Corporate customers:</b> Extract of the commercial register (validity from within the last six weeks) identification of the authorized representatives, evidence of the beneficial owner, KYC Questionnaire, type of business; general description of the business in detail, Annual Reports, Articles of Association, source of funding, expected turn overs, proofs of origins, etc.</p> <p><b>Financial Institutions:</b> Basic documentation for all types of businesses with Financial Institutions necessary e.g. extract of the commercial register, AML/KYC Questionnaire, etc. Extended documentation is obliged for nostro accounts, vostro accounts, TRE transactions (FX, derivatives, MM, etc.) and fundings. The extended documentation includes for example identification of</p>



			the authorized representatives, evidence of the beneficial owner, evidence of the source of funds, approval of Head of Department of Global Financial Institutions and Head of Compliance, etc Face-to-face in relation to nostro and vostro accounts mandatory, otherwise written or virtual communication channel.
25.	Does the institution have business entities located in other countries/territories besides its original place of registration and jurisdiction?	Yes	Germany, Czech Republic, Slovakia, Hungary
26.	Location of customers/clients		Oberbank runs all of its main business centralized out of the headquarters in the city of Linz, Austria. Customers of Oberbank must have a strong tie to our catchment area. Outside of the headquarters, there are only branches located in Germany, Czech Republic, Slovakia and Hungary.
27.	To clients of which region(s)/country(ies) does the financial institution mainly offer services?		Within our catchment area Austria, Germany, Czech Republic, Slovakia and Hungary.
28.	In how many locations is the financial institution operationally present (list regions)?		5 - Austria, Germany, Czech Republic, Slovakia and Hungary
29.	Does the financial institution have branches or subsidiaries in any of the following countries subject to international sanctions?		Cuba: No                      Crimea: No Iran: No                      Myanmar: No  North Korea: No              Sudan: No Syria: No                      Russia: No Belarus: No  Oberbank runs only branches and subsidiaries in our 5 countries (Austria, Germany, Czech Republic, Slovakia, Hungary).
30.	Please confirm the branches and/or subsidiaries of the institution to which the responses to this questionnaire are applicable:		Head Office and Domestic Branches: Yes International Branches: Yes Domestic Subsidiaries: Yes International Subsidiaries: Yes  Oberbank runs only branches and subsidiaries in our 5 countries (Austria, Germany, Czech Republic, Slovakia, Hungary).
31.	Number/network of branches/Representative offices:		176 (12/2024)
32.	Number of employees		2.227 (12/2024)

### 3. Compliance Structure

33.	Briefly describe the organizational structure of the Compliance area (main divisions, support areas, others):		Main Divisions: AML/CTF, Sanctions & Embargos, Fraud Detection Center, Securities Compliance
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34.	Indicate the organizational dependence of the Compliance area (i.e. to the Audit Committee, CEO, Legal, other):		The Compliance Department is totally independent from other departments (e.g. Audit Committee, Legal Department); Compliance Department is reporting directly to the Board of Management; we have a three stage AML process starting by the account managers in the branches as first line of defence, Compliance Department is the second line of defence, and the Audit Committee is the third line of defence.
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#### 4. AML Policies, Procedures and Controls

35.	Does the financial institution have written policies and procedures in place regarding anti-money laundering, know-your-customer, sanctions and Foreign Corrupt Practices Act (FCPA)?	Yes	
36.	Disclosure of the financial institutions AML policy		Please note that we do not disclose our internal policies – they are based on national legislation and supervised by the Austrian Financial Market Authority (FMA). Please find more information at <a href="https://www.oberbank.com/documents/20732/65241/fi_corresp_banking_declar.pdf/de087a13-1dcd-45a1-b91e-d0a7a38b10da">https://www.oberbank.com/documents/20732/65241/fi_corresp_banking_declar.pdf/de087a13-1dcd-45a1-b91e-d0a7a38b10da</a>
37.	Does the policy reflect a regular process for your financial institution to obtain information about its customers that relate to money laundering risk, including name, address, type of business and anticipated nature of transactions between the customer and your financial institution?	Yes	
38.	Does the policy reflect a regular process to identify categories of suspicious activity by monitoring customer transactions?	Yes	
39.	Does the policy reflect a process to notify appropriate government/supervisory authorities regarding suspicious activity?	Yes	
40.	Does the financial institution follow the anti-money laundering policies established by the responsible regulatory authority in the 5 countries?	Yes	<a href="https://www.fma.gv.at/en/compliance">https://www.fma.gv.at/en/compliance</a> <a href="https://www.bmf.gv.at/en/topics/financial-sector.html">https://www.bmf.gv.at/en/topics/financial-sector.html</a>
41.	Do your branches and affiliates follow the Group AML, KYC, Sanctions and FCPA policies?	Yes	
42.	Does your AML, Counter Terrorism Financing and Sanctions Compliance Policy(s)/Program(s) require approval from your Management Board?	Yes	
43.	How frequently is your firm's AML, KYC, Sanctions and FCPA Policy updated?		In case of legal changes and at least once a year approved by the Management Board.





44.	FATCA Compliance Status Please provide the contact details of the FATCA responsible person		Reporting Model 2 FFI FATCA Responsible Person Name: Mr. Florian Hagenauer, Management position: Member of the Management Board Telephone: +43 732 7802-0 Email: sek@oberbank.at
45.	Does the financial institution follow FATF recommendations on money laundering and terrorist financing?	Yes	
46.	Has the financial institution been subject to sanctions or punitive actions related to Money Laundering / Terrorist Financing by a regulator or law enforcement during the past five years?	Yes	May 2023 - Hungarian Branch: Nature of violation: Fine due to delayed build-up of sufficient personnel resources; Imposing/Enforcing authority: Hungarian Central Bank; Amount of penalty: HUF 6 Mio.; Remedial measures undertaken: The penalty resulted from the Bank's failure to implement a measure that had already been determined. Specifically, human resources had to be built up within a certain period of time. The measure has now been duly implemented, personnel resources were increased as agreed.
47.	Describe the structure and reporting line of your AML group. How large is the team globally?		<p>The Compliance Department is totally independent from other departments (e.g. Audit Committee, Legal Department); Compliance Department is reporting directly to the Board of Management; we have a three stage AML process starting by the account managers in the branches as first line of defence, Compliance Department is the second line of defence, and the Audit Committee is the third line of defence. We also have decentralised compliance officers in our business and service departments.</p> <p>The independent Group AML/CTF officer is heading an AML-Team of 11,17 FTE based in the headquarters in Linz, who exclusively deals with AML/CTF affairs. Additionally, there is an independent Group Sanctions officer with a team of 3 people. Furthermore 2 local AML officers in each foreign branch in accordance with local law are implemented, which are reporting to and be controlled by the Group AML/CTF Officer, handling AML/CTF issues.</p>
48.	Does the FI use third parties to carry out the AML/CTF functions?	No	
49.	Does your financial institution have a designated Anti-Money Laundering Compliance Officer?	Yes	Mr. Bernhard Wolfschütz, Head of Compliance-AML



50.	To whom does the Chief Compliance/AML Officer report?		The Chief Compliance/AML Officer reports directly to Mr. Florian Hagenauer, Member of the Management Board.
51.	Do you have a formal training program in place to address Anti-Money Laundering and Know Your Customer responsibilities?	Yes	
52.	Do all employees receive AML and KYC training?	Yes	
53.	How frequently is the training given?		For new employees, a basic training within the first four weeks after onboarding is binding. All the other employees have to pass a web-based training certification at least once a year, or in case of legal changes.
54.	Do any employees receive specialized training based on their role?	Yes	AML employees are required to attend at least one external seminar per year. Members of the Board, Head of departments as well as the AML Group Officer are required to attend quarterly regulatory presentations (including AML/CTF issues) held by an external provider.
55.	Does the financial institution ensure AML principles for non-employed workers?	Yes	In addition to the Code of Conduct for employees, Oberbank also has a Code of Conduct for suppliers and business partners, which extends the rules and measures mentioned in the Code of Conduct to cooperation with external partners. All suppliers of Oberbank must comply with these principles, which include observance of the law, respect for human rights, various environmental regulations and the prohibition of corruption and bribery. The Code of Conduct was systematically presented to our existing and is also presented to our new suppliers for signature, thus guaranteeing its compliance.
	Has the financial institution implemented training for non-employed workers?	No	They are themselves obliged by Austrian Anti Bribery & Corruption Law. Please see above and find more information on the Code of Conduct for suppliers and business partners at <a href="https://www.oberbank.at/documents/20195/418255/global_obk_LieferantenCoC.pdf">https://www.oberbank.at/documents/20195/418255/global_obk_LieferantenCoC.pdf</a>
56.	Does the financial institution have a monitoring process in place to detect suspicious transactions?	Yes	
57.	Is the process to detect suspicious transactions manual or automated?	Auto	a) If automated, what AML system/vendors do you use for embargo/sanctions screening? IMTF Siron AML IMTF Embargo IMTF KYC  b) Have there been any significant enhancements to your system in the past 3 years? There is a continuous adaption of the system (e.g. updating indications).





58.	Do your branches utilize the same AML monitoring and Sanctions systems as the Group?	Yes	
59.	What factors do you consider in initiating an Event Driven Review and who can initiate the EDR?		Suspicious Transactions in monitoring or negative news screening, change in risk assessment can be initiated by any employee but is typically initiated by AML or Audit Department.
60.	Do you have negative news screening?	Yes	The negative news screening process is manually conducted. News screening is case related but in general it is part of the review process. When there is any conspicuity, we conduct a global review. In addition, every AML officer has the possibility to conduct such a review, even without any reasons.
61.	Do your negative information screening parameters include: "Illegal distribution of arms"? "Illegal Narcotics"? "Human Trafficking"?	Yes Yes Yes	
62.	Do you risk rank your clients?	Yes	We risk rank our clients within a 5-step risk matrix (high, medium-high, medium, medium-low, low) but do not disclose internal policies in detail. System is in accordance with legal and supervisory requirements in Austria.
63.	Does the policy require your financial institution to decline business with excessive money laundering risk, and to carefully track high risk accounts to protect against money laundering?	Yes	
64.	What is your Periodic Review cycle (per risk rating)?		All client segments are reviewed on a daily basis. The different risk levels are identified by IT-indications but can also be set manually. Documentation for Medium-high to high risk level customers are updated every year; medium every three years and low, medium-low risk level customers are updated every five years. All of them are additionally reviewed occasionally (e.g. in case of asking for a new product).
65.	Does your AML policy anticipate a regular audit or review by persons whose principal function is to audit or review your financial institution, to determine that the AML program in place is substantially functioning as designed?	Yes	
66.	Does your institution have an internal audit function or other independent third party that assesses AML/CTF policies and practices on a regular basis?	Yes	Internal Audit Department
67.	How often are AML and Anti-bribery/Corruption internal audits performed?		At least annually



68.	When was the date of the last internal audit of the AML program?		May 2024
69.	Please provide details of your external auditor		Name: Deloitte Audit Wirtschaftsprüfungs GmbH Address: Renngasse 1/Freyung, 1010 Vienna Date of your most recent external audit: semi-annually, 03/2025
70.	Were there any findings related to AML, Sanctions or Anti-bribery and Corruption?	No	
71.	When was the last regulatory exam related to AML and which regulatory body conducted the exam?		Oberbank was last audited in May 2025 by the Austrian Financial Market Authority (FMA).
72.	Did any findings or corrective actions result from the exam?	No	
73.	Are you aware of any material issues related to your AML, Sanctions and/or Anti-bribery program and/or do you expect any regulator to issue any material findings, fines, sanctions or other related action related to your AML Program?	No	
74.	Do you engage any third party vendors, contractors or others to assist with or to carry out any function related to your AML program?	No	

#### 4.1. Politically Exposed Person(s)

75.	Is any of your bank's owner or senior management a politically exposed person (PEP) as defined by FATF?	Yes	Name: Mr. Franz Gasselsberger Management position: CEO & Chairman of the Management Board  PEP Information as defined by FATF: Diplomat (Honorary Consul of Germany) By Austrian and German Law, the Honorary Consul is NO PEP, but as this function may be considered as PEP by your local law and under consideration of PEP screening lists provided by World Check and others, we marked Mr. Gasselsberger as PEP.  Please find more information at <a href="https://www.oberbank.com/documents/20732/412157/ir_pepstatus.pdf/72a2049f-2d08-d4b4-f048-19755fd5e43c?t=1613654056690">https://www.oberbank.com/documents/20732/412157/ir_pepstatus.pdf/72a2049f-2d08-d4b4-f048-19755fd5e43c?t=1613654056690</a>
76.	Are there PEPs within the Supervisory Board of your institution?	Yes	PEPs in Supervisory Board:  Name: Mr. Franz-Peter Mitterbauer - close relative (Brother) to Ms. Maria Theresia Niss (Function: Member of the National Council until October 2024)



77.	Are PEPs and high-risk clients subject to enhanced due diligence?	Yes	<p>All PEPs are high risk customers for us, which means that the approval of the AML-officer is necessary to open an account (EDD).</p> <p>Beside intense automated screening we also monitor PEP's manually. Both continuously and at onboarding. We also have the PEP-Question on our KYC – if a person answers the PEP-question with “yes” the AML-Officer (approval) has to be contacted. For screening we use World Check and individual lists. We use SIRON KYC for the automated verification of our customer base. The PEP lists are updated daily.</p>
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#### 4.2. Customers and High Risk Products

78.	Which business relations or banking services does the bank offer, which need approval either by the AML Officer or by the Board of Management?		<p>We only establish a business relationship with the following customers after the AML Officer has authorized it:</p> <ul style="list-style-type: none"><li>- Persons with PEP status</li><li>- Foreign trustees or trustors</li><li>- Clients with (domicile) in risk countries (black, grey, internal list, embargo countries, third countries with high risk)</li><li>- Business relationships with clients with relation to DelVO third countries</li><li>- Limited companies (Ltd, PLC, LLC etc.) as customers</li><li>- Foreign companies with headquarters outside the EU</li><li>- Domestic companies whose beneficial owner has its registered office in a listed country</li><li>- Domestic companies whose shareholder is a Austrian AG located outside the EU is</li><li>- Foreign foundations and trusts</li><li>- Correspondent banking relationships with respondent banks in third countries</li></ul> <p>Despite of special long lasting existing customers, we only establish a new business relationship with the following customers after authorization by the Board of Management</p> <ul style="list-style-type: none"><li>- The following branches: Betting and gambling, red light (if not prohibited due to ESG criteria), weapons (if not prohibited due to ESG criteria)</li><li>- Foreign political parties</li><li>- Companies that can be associated with a foreign political party</li><li>- Customers (domiciled) in offshore countries</li><li>- Companies operating in the cryptocurrency sector</li><li>- Companies that hold an account with Oberbank in order to use it for crowdfunding</li></ul>
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			<ul style="list-style-type: none"> <li>- Companies operating as money transfer service providers outside a regulated market</li> <li>- Foreign organizations that want to open an account for the purpose of fundraising</li> </ul>
79.	The institution does NOT establish or maintain business relations and does NOT offer banking services for customers of these types:		<p>We do not establish or maintain business relations and do not offer banking services for customers if</p> <ul style="list-style-type: none"> <li>- they violate labor law conditions</li> <li>- children are employed or child labor becomes known in the process of a detailed audit</li> <li>- human rights are systematically violated</li> <li>- they are involved in illegal business practices</li> <li>- they have a controversial environmental behavior</li> </ul> <p>The following business areas are also excluded:</p> <ul style="list-style-type: none"> <li>- nuclear energy</li> <li>- Illegal substances (narcotics)</li> <li>- harmful substances</li> <li>- shell companies/banks</li> <li>- gemstones (blood diamonds) and conflict minerals</li> <li>- fishing, if the internationally recognized standards and agreements are not met</li> <li>- trade with protected animals or export leather, as well as animal testing</li> <li>- high volume fracking and extraction of oil sands</li> <li>- crude oil</li> <li>- coal</li> <li>- controversial and heavy weapons</li> <li>- embryo research (not included: in vitro fertilization)</li> <li>- pornography industry and comparable industries ("red light district", adult entertainment)</li> <li>- mining</li> <li>- betting and gambling</li> </ul> <p>Please find further information about Oberbank's criteria of exemption in our sustainability report <a href="https://www.oberbank.com/sustainability">https://www.oberbank.com/sustainability</a> and <a href="https://www.oberbank.com/strategy-and-guidelines">https://www.oberbank.com/strategy-and-guidelines</a></p>
80.	Does the financial institution perform a Due Diligence procedure to all of its customers?	Yes	<p>Retail customers:</p> <p>Valid and official ID Cards (e.g passport or identity card with a photo – released from a state authority), verifying the truth of the provided ID; In most cases, the customer has to show his ID card personally;</p>



			<p>KYC Questionnaire is mandatory; Proof of origin for higher income amounts, general customer information for plausibility checks, there must be a regional relation to the respective market. For retail Austrian customers it is also possible to open an account online.</p> <p>Corporate customers: Extract of the commercial register (validity from within the last six weeks) identification of the authorized representatives, evidence of the beneficial owner, KYC Questionnaire, type of business; general description of the business in detail, Annual Reports, Articles of Association, source of funding, expected turn overs, proofs of origins, etc.</p>
81.	Does the financial institution have an obligation to identify the Ultimate Beneficial Owner of all of its clients?	Yes	Over 25% (25+1) on the first line, over 50% (50+1) from the second line on.
82.	Does the FI have a risk-based assessment of its customer base and their transactions?	Yes	We have a risk-based assessment of our customers and their transactions. We identify every high risk customer through our AML program, the involvement of high risk customers is absolutely low and is only done with long standing, reputable customers. All of our customers are classified into different risk classes. Our risk-based approach is updated as needed or at least once a year. Customers are identified and classified on the basis of internal risk assessments in compliance with the legal provisions of the Financial Market Money Laundering Act and the Austrian Banking Act. In general, we do not accept new business for high-risk segments. In justified cases, approval by the Money Laundering Officer or the Management Board is required.
83.	Does the financial institution accept walk-in customers and/or account opening request from an online banking platform?	No	<p>Online Banking Platform: New customers have the possibility to open an account only via the website Oberbank.com. Oberbank currently offers the eps 1-cent transfer for online legitimation. This requires an existing Austrian account at an Austrian financial institution with Internet banking access and is only available for Austrian citizens. Using the eps transfer, 1 cent is transferred to the Oberbank merchant account and, together with a copy of the legitimation document, Oberbank reviews the customer's identity. If the legitimation documents are checked, the account can be opened.</p> <p>Walk in Customers: We do not provide services to non-account holders. Cash Transactions to walk in customers are limited to EUR 1,000.- or equivalent. Identification of the walk in</p>



			<p>customer is required (mainly money exchange from tourists, and they have to identify themselves).</p> <p>We do not provide services to non-account holders. Cash Transactions to walk in customers are limited to EUR 1,000.- or equivalent. Identification of the walk in customer is required.</p>
84.	Does the financial institution have policies and procedures prohibiting your bank from providing services for shell banks?	Yes	
85.	Does the financial institution have procedures for record retention?	Yes	Yes, Record retention in AML in accordance with Austrian Law for at least 10 years (§ 21/1 FM-GwG). We keep records at least 10 years and, if possible, unlimited. AML-monitoring data cannot be deleted on the system side.
86.	Does the financial institution provide Correspondent Banking services as a product to other financial institutions?	No	a. In USD? No b. In EUR? No c. In GBP? No d. In Local Currency? No
	To domestic affiliates?	No	Oberbank does NOT act as a clearing bank, please see statement <a href="#">Correspondent Banking Declaration</a> Oberbank runs European branches in Austria, Germany, Czech Republic, Slovakia and Hungary. In those countries we are providing full universal banking services to local customers. Oberbank's branches located in those countries are dependent branches. They are neither allowed to establish own banking relationships nor to act as independent bank. Their own SWIFT addresses are internally used for identification or routing purposes or regulatory reporting purposes only. all activities (especially funding, refinancing, transaction banking) are centralized at the Head Office Linz, which is the single entry point for the whole bank. They are fully integrated in the relevant core systems of the bank. Please find more information at our "Policy concerning Incoming & Outgoing Payment Transactions": <a href="https://www.oberbank.com/documents/20732/412157/ir_policy_payment_transactions.pdf/ebf8f522-ce4f-3876-d456-1d8a794ad1e1?t=1613654459257">https://www.oberbank.com/documents/20732/412157/ir_policy_payment_transactions.pdf/ebf8f522-ce4f-3876-d456-1d8a794ad1e1?t=1613654459257</a>
	To foreign affiliates?	No	
	To domestic banks?	No	
	To foreign banks?	No	
87.	Does the financial institution issue and accept clients that issue bearer instruments or are capable of issuing bearer instruments?	Yes	Oberbank issues and accepts clients issuing bearer shares and refers to FATFs conclusion at their national audit in Austria 2009 in terms of AML risk concerning bearer shares as follows: "... Bearer Shares are high risk in general, unless a company lists at a public stock exchange, because of very strict





			<p>disclosure requirements and reporting obligations (Austrian Stock Exchange Act; Austrian Securities Supervision Act). ...". As a consequence, the Austrian Financial Market Authority and also FATF assess this particular scenario concerning bearer shares in Austria as low risk with regard to AML/CTF-issues, while issuing bearer shares has been prohibited for all other scenarios in Austria since 2011 by law as a consequence of FATF's audit. This assessment corresponds with the risk based approach, resulting from 3<sup>rd</sup>, 4<sup>th</sup> as well as the 5<sup>th</sup> Money Laundering Directive.</p> <p>For further details, please see statement <a href="https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a">https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a</a></p>
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5. Sanctions			
88.	Do your branches and affiliates follow the Group Sanctions policies?	Yes	
89.	How frequently is your firm's Sanctions Policy updated and who approves it?		In case of legal changes, but at least once a year approved by the Management Board.
90.	Do you have a formal training program in place to address Sanctions and Embargo responsibilities?	Yes	
91.	Do all employees receive Sanctions training?	Yes	
92.	Does the financial institution ensure Sanctions principles for non-employed workers?	Yes	<p>In addition to the Code of Conduct for employees, Oberbank also has a Code of Conduct for suppliers and business partners, which extends the rules and measures mentioned in the Code of Conduct to cooperation with external partners. All suppliers of Oberbank must comply with these principles, which include observance of the law which also includes relevant sanction regulations, respect for human rights, various environmental regulations and the prohibition of corruption and bribery. The Code of Conduct was systematically presented to our existing and is also presented to our new suppliers for signature, thus guaranteeing its compliance. Please find more information on the Code of Conduct for suppliers and business partners at <a href="https://www.oberbank.at/documents/20195/418255/global_obk_LieferantenCoC.pdf">https://www.oberbank.at/documents/20195/418255/global_obk_LieferantenCoC.pdf</a></p>
93.	Do you have an embargo/sanction monitoring process in place?	Yes	



94.	Is the embargo/sanction monitoring process manual or automated?	Auto	a) If automated, what system/vendors do you use for embargo/sanctions screening? IMTF Siron Embargo and IMTF Siron KYC  b) Have there been any significant enhancements to your system in the past 3 years? There is a continuous adaption of the system (e.g. updating indications, risk management).
95.	Does the financial institution use Sanctions Lists for screening processes?	Yes	Oberbank uses the IMTF Siron KYC Screening, which is used for screening customers and beneficial owners, which means there is a daily check against all important like for instance: <ul style="list-style-type: none"><li>• Consolidated United Nations Security Council Sanctions List (UN)</li><li>• United States Department of the Treasury's Office of Foreign Assets Control (OFAC)</li><li>• European Union Consolidated List (EU)</li><li>• Office of Financial Sanctions Implementation HMT (OFSI)</li><li>• World Check</li></ul>
96.	Do your branches utilize the same Sanctions systems as the Group?	Yes	
97.	Does your institution have an internal audit function or other independent third party that assesses Sanctions policies and practices on a regular basis?	Yes	Internal Audit Department
98.	How often are Sanctions internal audits performed?		At least annually
99.	Are you aware of any material issues related to your Sanctions program and/or do you expect any regulator to issue any material findings, fines, sanctions or other related action related to your Sanctions Program?	No	
100.	Is any of the beneficial owners or senior management officials of the financial institution sanctioned (e.g. US OFAC, UN, EU or national sanction list)?	No	
101.	Is any of the financial institution's beneficial owners or shareholders or senior management officials a resident in Iran, Syria, North Korea, Cuba, Myanmar, Russia, Crimea or Sudan?	No	
102.	Does the financial institution have correspondent banking relationships with any bank in sanctioned countries?		



	Iran	Yes	Iran: After the reinstallation of the US secondary sanctions, Oberbank created a written Iran-Policy, which you also can find on Oberbank's website. Under the Iran-Policy, Oberbank collaborates only and exclusively in humanitarian businesses with selected and experienced long time Oberbank customers. Strict compliance audit in advance (checking goods and persons whether they are sanctioned, export license, strict AML and terrorism checks, obtaining contracts and invoices, dual use check, customer confirmation that they only deliver the goods of the export license and contract). Approval of Management Board is mandatory. We neither act as a clearing bank nor do we accept requests for bank to bank transfers in general. For further details, please see statement <a href="https://www.oberbank.com/web/oberbank-com/iranbusiness">https://www.oberbank.com/web/oberbank-com/iranbusiness</a> Reconfirmation on a regular basis, for current reconfirmation please see <a href="https://www.oberbank.com/web/oberbank-com/iranbusiness">https://www.oberbank.com/web/oberbank-com/iranbusiness</a>
	Cuba	Yes	Cuba: We only have occasional documentary business for a selected small round of own customers under strict compliance audit in advance, which include the proof of sanctions and authority regulations.
	Crimea, Donetsk, Luhansk, Syria, Sudan, North Korea	No	
103.	Does the financial institution have any branches/affiliates in sanctioned countries?	No	
104.	What percentage of your client base is located in sanctioned countries?	<0,1 %	
105.	How have the ever-changing sanctions regimes affected the way you do business?		Due to our conservative risk appetite and our regional principle, we have strict control measures in place. Among other things, we closely screen new and existing customer related to sanctioned countries as well as circumvent sanctions.
106.	What are some countries/corridors that you closely monitor which may be susceptible to evading current sanctions?		Countries such as Hong Kong, China, UAE, Turkey, India, Serbia, Montenegro or CIS states are particularly susceptible to circumvention of existing sanctions and particular caution is required for new customers who mainly process transactions in these countries. If there is a suspicion that a transaction



			could be a circumvention of sanctions, this may lead to the transaction being rejected.
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## 6. Documentation and Links

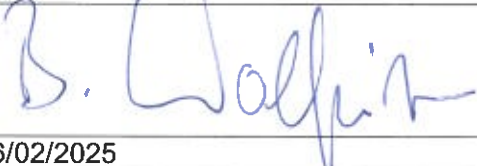
107.	Incorporation documents (e.g. Banking License / Commercial License / Registration Certificate / Wolfsberg Questionnaires)		Please find more information at <a href="https://www.oberbank.com/compliance-information">https://www.oberbank.com/compliance-information</a>
108.	Annual report		Please see our website <a href="https://www.oberbank.com">www.oberbank.com</a> – Investor Relations – <a href="#">Figures and Reports</a>
109.	Sustainability statement in the Annual Report (DE version, page 60 ff.)		Please find more information at <a href="https://www.oberbank.at/documents/20195/559187/ir_global_k_gb24.pdf">https://www.oberbank.at/documents/20195/559187/ir_global_k_gb24.pdf</a> and <a href="https://www.oberbank.at/nachhaltigkeit">https://www.oberbank.at/nachhaltigkeit</a>
110.	Sustainability report in brief (EN version 2024)		Please find more information at <a href="https://www.oberbank.com/documents/20195/15526479/irglobal_nachhaltigkeit24_kurz_ENG.pdf">https://www.oberbank.com/documents/20195/15526479/irglobal_nachhaltigkeit24_kurz_ENG.pdf</a> and <a href="https://www.oberbank.com/sustainability">https://www.oberbank.com/sustainability</a>
111.	Rating Report S&P Global Ratings		Please find a copy at <a href="https://www.oberbank.com/documents/20732/0/irglobal_bi_ratingbericht_obk_21032023.pdf">https://www.oberbank.com/documents/20732/0/irglobal_bi_ratingbericht_obk_21032023.pdf</a>
112.	ESG Rating Oberbank		Please find more information at <a href="https://www.oberbank.com/figures-and-reports">https://www.oberbank.com/figures-and-reports</a>
113.	Oberbank Company Presentation		Please find a copy at <a href="https://www.oberbank.com/documents/20732/412157/fi_factsfigures_HY_2024.pdf">https://www.oberbank.com/documents/20732/412157/fi_factsfigures_HY_2024.pdf</a>
114.	Compliance Statement - Bearer Shares		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a">https://www.oberbank.com/documents/20732/65241/fi_bearer_shares.pdf/66d97bbc-0856-4de4-890f-6e05a4754e7a</a>
115.	Correspondent Banking Declaration		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_corresp_banking_declar.pdf/de087a13-1dcd-45a1-b91e-d0a7a38b10da">https://www.oberbank.com/documents/20732/65241/fi_corresp_banking_declar.pdf/de087a13-1dcd-45a1-b91e-d0a7a38b10da</a>
116.	PEP Status		Please find more information at <a href="https://www.oberbank.com/documents/20732/412157/ir_pepstatus.pdf/72a2049f-2d08-d4b4-f048-19755fd5e43c?t=1613654056690">https://www.oberbank.com/documents/20732/412157/ir_pepstatus.pdf/72a2049f-2d08-d4b4-f048-19755fd5e43c?t=1613654056690</a>
117.	Policy concerning Incoming & Outgoing Payment Transactions		Please find a copy at <a href="https://www.oberbank.com/documents/20732/412157/ir_policy_payment_transactions.pdf/ebf8f522-ce4f-3876-d456-1d8a794ad1e1?t=1613654459257">https://www.oberbank.com/documents/20732/412157/ir_policy_payment_transactions.pdf/ebf8f522-ce4f-3876-d456-1d8a794ad1e1?t=1613654459257</a>
118.	US patriot Act Certification		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_usapatriotact.pdf/6b78fbd3-a0b1-475f-9e4f-250a8117f41d">https://www.oberbank.com/documents/20732/65241/fi_usapatriotact.pdf/6b78fbd3-a0b1-475f-9e4f-250a8117f41d</a>





119.	Extract from the commercial registry		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_certificateofincorporation.pdf">https://www.oberbank.com/documents/20732/65241/fi_certificateofincorporation.pdf</a>
120.	W-8BEN-E Form of the financial institution		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_w8ebene.pdf/7843f2b0-a3c8-43b2-9142-2597ccff65bc">https://www.oberbank.com/documents/20732/65241/fi_w8ebene.pdf/7843f2b0-a3c8-43b2-9142-2597ccff65bc</a>
121.	Automatic Exchange of Information - Common Reporting Standard (CRS)		Please find more information at: <a href="https://www.oberbank.com/documents/20732/65241/fi_CommonReportingStandard.pdf">https://www.oberbank.com/documents/20732/65241/fi_CommonReportingStandard.pdf</a>  EN: <a href="https://www.oberbank.com/documents/20732/65241/obk_impres_KundeninfoCRS_ENG.pdf">https://www.oberbank.com/documents/20732/65241/obk_impres_KundeninfoCRS_ENG.pdf</a>  DE: <a href="https://www.oberbank.com/documents/20732/65241/obk_impres_KundeninfoCRS.pdf">https://www.oberbank.com/documents/20732/65241/obk_impres_KundeninfoCRS.pdf</a>
122.	New Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) signed and dated		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_questionnaire.pdf">https://www.oberbank.com/documents/20732/65241/fi_questionnaire.pdf</a>
123.	New Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) signed and dated		Please find a copy at <a href="https://www.oberbank.com/documents/20732/65241/fi_finan_crime_fccq1_1.pdf">https://www.oberbank.com/documents/20732/65241/fi_finan_crime_fccq1_1.pdf</a>
124.	Official published documentation of Oberbank AG		KYC-Registry (provided by Swift) Due Diligence Repository (provided by Accuity)



We confirm that the information provided in the above Questionnaire is current, accurate and representative of the anti-money laundering and counter-terrorist financing policies and procedures as well as the compliance with sanctions regulations that are established in our institution.

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Date:	06/02/2025

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Date:	06/02/2025