## the Wolfsberg Group

Financial Institution Name: Location (Country) :

KfW IPEX-Bank Asia Ltd.	
Singapore	

F. MITTY & OWNERSHIP     Full Legal name	No#	Question	Answer
Full Legal name   Provided a list of foreign branches which are covered by list guestionnaire   Full Legal (Registered) Address   Selection Address   Full Legal (Registered) Address   Selection Address			71104101
Append a list of foreign branches which are covered by this questionnaire guestionnaire guestionnaire and the property of the	1		KfW IPEX-Bank Asia Ltd.
guestionnaire   The bank does not nave in yolegit practices   S Full Legal (Registered) Address   6. Shenton Way, #19-90. OUE Downtown 2   OS809 Singapore   -   S Full Primary Business Address (if different from above)   S Solect type of ownership and appeard an ownership chart if available   No   S Solect type of ownership and appeard an ownership chart if available   No   S A   Hi Y, indicate the exchange traded on and tocker symbol   S A   Hi Y, indicate the exchange traded on and tocker symbol   S A   Hi Y, indicate the exchange traded on and tocker symbol   S A   Hi Y, indicate the exchange traded on and tocker symbol   S A   Hi Y, provide details of shareholders or ultimate   S A   Hi Y, provide details of shareholders or ultimate   S A   Hi Y, provide tetails of shareholders or ultimate   S A   Hi Y, provide tetails of shareholders or ultimate   S A   Hi Y, provide tetails or wards composed of bearer shares   S A   Hi Y, provide the name of the relevant branch/es which   S A   Hi Y, provide the name of the relevant branch/es which   S A   Hi Y, provide the name of the relevant branch/es which   S A   Provide Legal Entity Identifier (LEI) if available   Does the Bank have a Virtual Bank License or provide   S S ANDITIONS PROGRAMME   Does the Bank have a programme that sets minimum AML   C F and Sanctions Standards regarding the following   components:  11	2	ŭ	
4 Full Primary Business Address (if different from above) 5 Date of Entity incorporation/establishment 6 Select yee of ownership and append an ownership chart if available 7 available 8 Publicy Traded (25% of shares publicly traded) 8 A Publicy Traded (25% of shares publicly traded) 8 A Publicy Traded (25% of shares publicly traded) 8 A Publicy Traded (25% of shares publicly traded) 8 A Publicy Traded (25% of shares publicly traded) 8 A Publicy Traded (25% of shares publicly traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 8 A Publicy Traded (25% of shares publicy traded) 9 A Publicy Traded (25% of shares publicy traded) 9 A Publicy Banking License (06L)? 9 A Publicy Banking License (06L)? 9 A Provide Legal Entity dentifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 202123379C 9 A Provide Legal Entity Identifier (1E.I) if available 20212339C 9 A Provide Legal Entity Identifier			The bank does not have any foreign branches
Full Primary Business Address (if different from above)	3	Full Legal (Registered) Address	· · · · · · · · · · · · · · · · · · ·
5 Select type of ownership and append an ownership chart if available 5 A Publicy Traded (25% of shares publicly traded) 5 A Publicy Traded (25% of shares publicly traded) 5 A Publicy Traded (25% of shares publicly traded) 5 A Publicy Traded (25% of shares publicly traded) 5 A Publicy Traded (25% of shares publicly traded) 5 B Member OwnerdMutual 6 C Government or State Owned by 25% or more 7 A Soft Entity's total shares composed of bearer shares 8 Does the Entity's total shares composed of bearer shares 9 Does the Entity's total shares composed of bearer shares 9 Does the Bank have a virtual Bank License or provide services only through online channels? 9 Does the Bank have a virtual Bank License or provide services only through online channels? 10 Provide Logal Entity Identifier (E. I) if available 2 AML, CTF & SANCTIONS PROGRAMME 11 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 11 a Appointed Officer with sufficient experience/expertise 11 b Adverse Information Screening 11 c Beneficial Ownership 12 Poes A Reporting 13 Independent Testing 14 Product Reporting 15 Provide Logal Entity Identifier (E. I) if available 16 Product Reporting 17 Provide Logal Entity Identifier (E. I) if available 18 Product Logal Entity Identifier (E. I) if available 19 Provide Logal Entity Identifier (E. I) if available 20 Provide Logal Entity Identifier (E. I) if available 20 Provide Logal Entity Identifier (E. I) if available 21 Provide Logal Entity Identifier (E. I) if available 22 Provide Logal Entity Identifier (E. I) if available 24 Provide Logal Entity Identifier (E. I) if available 25 Provide Logal Entity Identifier (E. I) if available 26 Provide Reporting 26 Provide Reporting 27 Provide Logal Entity Identifier (E. I) if available 28 Provide Logal Entity Identifier (E. I) if available 29 Provide Logal Entity Identifier (E. I) if available 20 Provide Logal Entity Identifier (E. I) if available 20 Provide Logal Entity Identifier (E. I) if available 21 If	4	Full Drimany Business Address (if different from above)	068809 Singapore
Select type of ownership and append an ownership chart if available  8 a Publicly Traded (25% of shares publicly traded)  8 b Publicly Traded (25% of shares publicly traded)  8 b Member Owned/Mutual  8 c Government or State Owned by 25% or more  8 d Privately Owned  9 d Privately Owned  9 d Privately Owned  10 Des the Entity or any of its branches, operate under an Ortshore Banking License (ORL)?  9 Des the Entity to any of its branches, operate under an Ortshore Banking License (ORL)?  9 Does the Bank have a Virtual Bank License or provide services only through online channels?  9 Provide Legal Entity Identifier (LE) if available  10 Des the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  11 A Appointed Officer with sufficient experience/expertise  12 Sereficial Ownership  13 A Appointed Officer with sufficient experience/expertise  14 Cash Reporting  15 Yes  16 Cash Reporting  16 Ves  17 E Do Sereming  17 Ves  18 Service Legal Entity of the Entity of Entity of Enti	-		08 07 2021 (LIEN: 202123879C)
available  8	6	, ,	00.07.2021 (OLN. 202123079C)
If Y, Indicate the exchange traded on and ticker symbol		, ,,	
Section	6 a	Publicly Traded (25% of shares publicly traded)	No
Se Government or State Owned by 25% or more  6. d Privately Owned  7. d Privately Owned  7. d Privately Owned  7. d Privately Owned  8. d Privately Owned  9. d Privately  9. d Pr	6 a1	If Y, indicate the exchange traded on and ticker symbol	-
6 d Privately Owned 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 8 Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? 8 If Y, provide the name of the relevant branch/es which operate under an OBL 9 Does the Bank have a virtual Bank License or provide services only through online channels? 10 Provide Legal Entity floatinifor (LE) if a valiable 202123879C 22. AML, CTF & SANCTIONS PROGRAMME 11 Does the Entity have a programmer that sets minimum AML, CTF and Sanctions standards regarding the following components: 11 Description of the provide standards regarding the following components: 12 Provide Capta (Provided Components) 13 Appointed Officer with sufficient experience/expertise 14 Appointed Officer with sufficient experience/expertise 15 Adverse Information Screening 16 Capta Reporting 17 Periodic Review 18 Periodic Review 19 Periodic Review 10 Periodic Review 10 Periodic Review 11 Policies and Procedures 11 Policies and Procedures 12 Periodic Review 13 Authority AMIL, CTF & Sanctions policy approved at least annually by the Board or equivalent Sanction 14 Legal Sanctions 15 Periodic Review Periodic Revie	6 b	Member Owned/Mutual	No
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7	6 d1		_
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11 a		CTF and Sanctions standards regarding the following	
11 b		•	
11 c   Beneficial Ownership   Yes     11 d   Cash Reporting   Not applicable     12 CDD   Yes     13 Independent Testing   Yes     14 Independent Testing   Yes     15 Independent Testing   Yes     16 Independent Testing   Yes     17 Independent Testing   Yes     18 Independent Testing   Yes     19 Independent Testing   Yes     11 Independent Testing   Yes     12 Independent Testing   Yes     13 Independent Testing   Yes     14 Independent Testing   Yes     15 Independent Testing   Yes     16 Independent Testing   Yes     17 Independent Testing   Yes     18 Independent Testing   Yes     19 Independent Testing   Yes     10 Independent Testing   Yes     11 Independent Testing   Yes     12 Independent Testing   Yes     13 Independent Testing   Yes     14 Independent Testing   Yes     15 Independent Testing   Yes     16 Independent Testing   Yes     17 Independent Testing   Yes     18 Independent Testing   Yes     19 Independent Testing   Yes     19 Independent Testing   Yes     19 Independent Testing   Yes     19 Independent Testing   Yes     10 Independent Testing   Yes     11 Independent Testing   Yes     11 Independent Testing   Yes     12 Independent Testing   Yes     13 Independent Testing   Yes     14 Independent Testing   Yes     15 Independent Testing   Yes     17 Independent Testing   Yes     18 Independent Testing   Yes     19 Independent Testing   Yes	11 a	• • • • • • • • • • • • • • • • • • • •	
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Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  17 Does the Entity provide mandatory ABC training to:  18 Board and Senior Committee Management Yes  19 Ist Line of Defence Yes  19 Yes			res
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independent third party cover ABC Policies and Procedures?  17 Does the Entity provide mandatory ABC training to: 17 a Board and Senior Committee Management Yes 17 b 1st Line of Defence Yes 17 c 2nd Line of Defence Yes	16		
Procedures?  17 Does the Entity provide mandatory ABC training to:  17 a Board and Senior Committee Management Yes  17 b 1st Line of Defence Yes  17 c 2nd Line of Defence Yes		,	Yes
17 a     Board and Senior Committee Management     Yes       17 b     1st Line of Defence     Yes       17 c     2nd Line of Defence     Yes			
17 b         1st Line of Defence         Yes           17 c         2nd Line of Defence         Yes	17	Does the Entity provide mandatory ABC training to:	
17 c 2nd Line of Defence Yes	17 a	Ÿ	Yes
	17 b		
17 d   3rd Line of Defence   Yes	17 c		
	17 d	3rd Line of Defence	Yes

17 e	Third parties to which specific compliance activities	L
	subject to ABC risk have been outsourced	Not Applicable
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes
4. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
18	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect	
	and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes Yes
18 с 19	Sanctions violations  Does the Entity have policies and procedures that:	Yes
19 a	Prohibit the opening and keeping of anonymous and	Yes
	fictitious named accounts	Tes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 с	Prohibit dealing with other entities that provide banking	Yes
40.4	services to unlicensed banks	
19 d 19 e	Prohibit accounts/relationships with shell banks Prohibit dealing with another Entity that provides services	Yes
	to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311	Yes
19 g	designated entities  Prohibit opening and keeping of accounts for any of	
	unlicensed/unregulated remittance agents, exchanges	Yes
	houses, casa de cambio, bureaux de change or money	
19 h	transfer agents Assess the risks of relationships with domestic and	V
	foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by	Yes
	employees	
19 ј	Outline the processes regarding screening for sanctions,	Yes
20	PEPs and Adverse Media/Negative News Has the Entity defined a risk tolerance statement or similar	
-"	document which defines a risk boundary around their	Yes
	business?	
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
	DD and EDD	
22 23	Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when CDD	Yes
23	must be completed, e.g. at the time of onboarding or within	Yes
	30 days?	
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d 24 e	Ownership structure Product usage	Yes Yes
24 e 24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25 25 a	Are each of the following identified:  Ultimate beneficial ownership	Yes
25 a 25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d 26	Other relevant parties  Does the due diligence process result in customers	Yes
	receiving a risk classification?	Yes
27	Does the Entity have a risk based approach to screening	V
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
28	Does the Entity have policies, procedures and processes to	
	review and escalate potential matches from screening	Yes
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
I		
29	Is KYC renewed at defined frequencies based on risk rating	Ivon
	(Periodic Reviews)?	Yes
29 a	(Periodic Reviews)?  If yes, select all that apply:	
	(Periodic Reviews)?	Yes No Yes

20.02	3 4 veers	Vaa
29 a3 29 a4	3 – 4 years 5 years or more	Yes No
29 a4 29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	
30	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?	
30 a	Arms, Defence, Military	Do not have this category of customer or industry
30 b	Respondent Banks	Do not have this category of customer or industry
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
30 с	Embassies/Consulates	Do not have this category of customer or industry
30 d	Extractive industries	EDD on a risk based approach
30 e 30 f	Gambling customers	Do not have this category of customer or industry
30 g	General Trading Companies  Marijuana-related Entities	EDD on a risk based approach  Do not have this category of customer or industry
30 h	MSB/MVTS customers	Do not have this category of customer or industry
30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	Do not have this category of customer or industry
30 k	Non-resident customers	Do not have this category of customer or industry
30 I	Nuclear power	Do not have this category of customer or industry
30 m	Payment Service Providers	Do not have this category of customer or industry
30 n	PEPS Class Associates	EDD on a risk based approach
30 o 30 p	PEP Close Associates PEP Related	EDD on a risk based approach
30 p 30 q	Precious metals and stones	EDD on a risk based approach EDD on a risk based approach
30 q	Red light businesses/Adult entertainment	Do not have this category of customer or industry
30 s	Regulated charities	Do not have this category of customer or industry
30 t	Shell banks	Do not have this category of customer or industry
30 u	Travel and Tour Companies	Do not have this category of customer or industry
30 v	Unregulated charities	Do not have this category of customer or industry
30 w	Used Car Dealers	Do not have this category of customer or industry
30 x 30 y	Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry  IPEX Asia does not book loans on ist balance sheet, nor does it takes deposits or provides payment services. Therefore fund transfers, monetary instruments, cash services, etc. are not offered by the bank.
31	If restricted, provide details of the restriction	instruments, cash services, etc. are not onered by the bank.
-	ORING & REPORTING	
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
33 a	If manual or combination selected, specify what type of transactions are monitored manually	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYME	NT TRANSPARENCY	
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	No
37 b	Local Regulations	No
37 b1	If Y, Specify the regulation	
37 c	If N, explain	The bank does not provide payment services, wire transfers or other related services.
8. SANCT		
38	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
39	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
41 e	Lists maintained by other G7 member countries	Not used
41 f	Other (specify)	Sanction list defined and published by MAS / 37b&c only to the extent (i) OFAC and HMT sanctions are applicable and (ii) that compliance with such sanctions complies with law applicable to the bank, in particular section 7 of the German Foreign Trade Ordinance and EU Blocking Statue, 37e partly, if applicable
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
9. TRAIN	IING & EDUCATION	
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
44 f	Non-employed workers (contractors/consultants)	Yes
10. AUD	IT	
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes

## Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

KfW IPEX-Bank Asia-Ltd. (Financial Institution name)

I, Lars Sauerbach (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

I, Sebastian Fenk (General Manager), certify that I have read and understood this declaration, that the answers provided in the Wolfsberg FCCQ are complete and correct to my honest belief.

 Sauerba
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\_ (Signature & Date)