

ANTI-MONEY LAUNDERING / ANTI-TERRORIST FINANCING STATEMENT

Germany, as one of the founding members of the Financial Action Task Force (FATF), adheres to the 40 anti-money laundering recommendations and eight special anti-terrorist financing recommendations that FATF developed.

Landesbank Berlin AG, Address: Alexanderplatz 2, 10178 Berlin, Germany, is a bank duly incorporated and existing under German banking law, under the supervision of the European Central Bank and the German Financial Supervisory Authority, Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), which acts in accordance with regulations issued by the European Union.

Landesbank Berlin AG (LBB) is a wholly-owned subsidiary of **Landesbank Berlin Holding AG** (LBBH), Address: Alexanderplatz 2, 10178 Berlin, Germany.

LBB is a non-listed joint stock company and a credit institution within the meaning of the German Banking Act (KWG). It is the responsible body of **Berliner Sparkasse** (BSK) and according to the Berliner Sparkassengesetz (Berlin Savings Banks Act) it is deemed an own Savings Banks Association. BSK is a public institution with partial legal capacities and is managed as a branch of LBB.

LBBH is indirectly beneficially owned by the German Savings Banks by way of two holding companies: **Erwerbsgesellschaft der S-Finanzgruppe mbH & Co. KG** (Acquisition Company of the Savings Banks Finance Group) with a share of 89.37 % and **Beteiligungsgesellschaft der S-Finanzgruppe mbH & Co. KG** (Equity Holding Company of the Savings Banks Finance Group) with a share of 10.63 %.

The Acquisition Company is a legal entity which was established solely for the purpose of buying the shares of LBBH. It is an unlimited liability partner in the Equity Holding Company. A KG or Kommanditgesellschaft is a German legal form of a company which has at least one partner with unlimited liability.

The only beneficial owner of Landesbank Berlin Holding AG (= entity that has 25 % or greater direct or indirect ownership in Landesbank Berlin Holding AG) is the above-mentioned "Acquisition Company": **Erwerbsgesellschaft der S-Finanzgruppe mbH & Co. KG, Schloss Neuhardenberg, Schinkelplatz, 15320 Neuhardenberg, Germany**

The German Savings Banks are the beneficial owners of the Acquisition Company and the Equity Holding Company. There is no entity that has a 5 % or greater direct or indirect ownership.

For more information on the Savings Banks Finance Group please refer to <https://www.dsgv.de/en>

Our bank has established internal procedures to detect and to intercept money laundering and proceeds from criminal activities in accordance with the German Money Laundering Act (Geldwäschegesetz – GwG and the German Banking Act (Kreditwesengesetz - KWG) and corresponding circular letters issued by BaFin, which entered into force on 29 November 1993 in Germany, and provides for the prerequisites for combating money laundering activities effectively. This Act, which came into effect following FATF's 40 recommendations, has been amended repeatedly and the statutory duties resulting therefrom have been clarified by the corresponding guidelines issued by BaFin.

German Banks are required by law (Abgabenordnung – AO, general tax code and corresponding circular letters of the Tax Authorities and BaFin) to check customers regularly and noting their respective identification documents.

We have a written policy in place to meet the requirements imposed, which include establishing and, on an ongoing basis, conducting customer due diligence and maintaining records in accordance with applicable regulations. The Landesbank Berlin AG has not been fined or sanctioned for failing to comply with Money Laundering laws and regulations yet.

Our Institution ensures that its credit / financial customers have adequate AML, CFT and KYC procedures in place. Our internal regulations do not allow to open or maintain anonymous or numbered accounts.

We carry out an on-going Anti-Money Laundering Training and Awareness Programme for appropriate personnel and we conduct an independent audit of the Programme. Besides our web based trainings we support our employees in special AML training courses. New AML related laws or changes to existing AML related policies are communicated to our staff.

We have implemented clear procedures to identify and report suspicious transactions and to confirm the legitimacy of the source and destination of larger transactions before processing them.

It is not part of our business to offer banking services to any bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group (shell bank). We have a policy to ensure that we will not conduct transactions with or on behalf of shell banks through any of our accounts or products.

We do neither maintain relationships with banks that use payable-through-accounts nor do we keep such accounts in our own books.

Our policy covers relationships with foreign and domestic Politically Exposed Persons (PEPs), their families and close associates.

The Anti-Money Laundering Policy and Programme are applicable to our Head Office and our domestic network.

Our Anti-Money Laundering unit is responsible for the observance of Anti-Money Laundering Requirement and also Fraud Prevention.

Landesbank Berlin AG
Alexanderplatz 2
10178 Berlin / Germany

Name: Agnes Maria Wildner (Ms)
Title: Head of Compliance
Signature:

A handwritten signature in black ink, appearing to be 'AWildner', is written over a horizontal line. The signature is cursive and somewhat stylized.

As of 7th July 2020