



Financial Institution Name:

Location (Country):

ABN AMRO Bank N.V.

The Netherlands

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	ABN AMRO Bank N.V.
2	Append a list of foreign branches which are covered by this questionnaire	see Appendix I - List of Entities
3	Full Legal (Registered) Address	Gustav Mahlerlaan 10 1082 PP, Amsterdam, The Netherlands
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	09-04-2009
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Euronext Amsterdam ABN
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	None
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	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	ABN AMRO Bank N.V. BFXS5XCH7N0Y05NIXW11
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	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes

11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 l	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
13 a	If Y, provide further details	The bank may rely on third parties for the performance of identification and verification of the client's/UBO's identity or obtaining information on the purpose and intended nature of the business relationship. Where the bank relies on a third party, the ultimate responsibility for CDD, remains with the bank.
14	Does the entity have a whistleblower policy?	Yes
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
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
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes
4. AML, CTF & 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
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 g	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
19 h	Assess the risks of relationships with domestic and 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 employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
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
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
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	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
28	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?	Yes
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	Yes
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	Always subject to EDD
30 b	Respondent Banks	EDD on risk-based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	Embassies/Consulates	Always subject to EDD
30 d	Extractive industries	Always subject to EDD
30 e	Gambling customers	Always subject to EDD
30 f	General Trading Companies	EDD on risk-based approach
30 g	Marijuana-related Entities	Always subject to EDD
30 h	MSB/MVTS customers	Always subject to EDD
30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	EDD on risk-based approach
30 k	Non-resident customers	Always subject to EDD

30 l	Nuclear power	EDD on risk-based approach
30 m	Payment Service Providers	Always subject to EDD
30 n	PEPs	Always subject to EDD
30 o	PEP Close Associates	Always subject to EDD
30 p	PEP Related	Always subject to EDD
30 q	Precious metals and stones	Always subject to EDD
30 r	Red light businesses/Adult entertainment	Always subject to EDD
30 s	Regulated charities	Always subject to EDD
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on risk-based approach
30 v	Unregulated charities	Always subject to EDD
30 w	Used Car Dealers	Always subject to EDD
30 x	Virtual Asset Service Providers	Always subject to EDD
30 y	Other (specify)	EDD measures are applied, among others, in respect of the following industries: Cash-intensive, Retail sellers of luxury items, Diamond & Jewellery, MSBs, Religious charitable & NPOs, Investment companies/funds, Commercial Real Estate, Trust and company service providers, Specific sports sectors, Tobacco products, Cultural artefacts and other related items, Ivory and protected species. Additional information to the answers Q76g and 76h: the local banks (in the context of the Dutch Banking Association) have, in consultation with the Dutch Ministry of Finance, agreed to offer clients from these sectors (subject to strict requirements and enhanced due diligence) primary banking services, in the form of a basic corporate account, in order to avoid excluding these client types from access to the financial system. 76k. For former HAL, EDD is conducted on a risk-based approach for non-resident clients. This process is fully aligned with local requirements regarding AML/CFT.
31	If restricted, provide details of the restriction	ABN AMRO applies the Exclusion and Controversial Weapons Lists which prohibits knowingly financing/investing into certain sectors/clients. In line with Dutch regulatory requirements basic banking services are available for adult industry/coffeeshops.
6. MONITORING & 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?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Risk based post manual monitoring (in addition to automated monitoring) is performed for certain client segments. For all trade finance transactions a trade due diligence is performed manually prior to execution. The pre-trade due diligence checks encompass an assessment of a wide range of red flags.
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. PAYMENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
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	Yes
37 b	Local Regulations	No
37 b1	If Y, Specify the regulation	
37 c	If N, explain	ABN AMRO complies with FATF recommendation 16 and EU Wire Transfer Regulation accordingly. No further local regulations applicable.
8. SANCTIONS		
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 transac
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 transac
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transac
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transac
41 e	Lists maintained by other G7 member countries	Not used
41 f	Other (specify)	Local lists (if applicable) maintained by branches are both used for screening customers and beneficial owners and for filtering transactional data; see Appendix I - List of Entities. Also see: https://www.abnamro.com/en/information/sanctions-measures-foreign-countries
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?	No
9. TRAINING & 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	Yes
44 f	Non-employed workers (contractors/consultants)	Yes
10. AUDIT		
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) ABN AMRO Bank N.V., _____ (Financial Institution name) I, <u>J.A.G. Voors</u> _____ (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.  _____ 22 July 2026__ (Signature & Date)		

List of Entities

The Netherlands CEO Marguerite Bérard			
ABN AMRO Bank N.V.	Gustav Mahlerlaan 10 1082 PP Amsterdam The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Clearing Bank N.V.	Gustav Mahlerlaan 10 1082 PP Amsterdam The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Hypotheken Groep B.V.	Postbus 1700 3800 BS Amersfoort The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
International Card Services B.V.	Wisselwerking 32 1112 XP Diemen The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM)
ABN AMRO Asset Based Finance N.V.	Beneluxlaan 1010 3526 KK Utrecht The Netherlands	The Netherlands	De Nederlandsche Bank (DNB) Autoriteit Financiële Markten (AFM)
Australia CEO (Head of AACB APAC) Adrian Rubin			
ABN AMRO Clearing Sydney Pty Limited	255, George Street, Level 8, Suite 1 Sydney NSW 2000 Australia	Australia	Australian Securities and Investment Commission (ASIC) Australian Transaction Reports and Analysis Centre (ASTRAC) Foreign Investment Review Board (FIRB)
Belgium Country Executive Joachim Aelvoet			
ABN AMRO Bank N.V., Belgium Branch	Borsbeeksebrug 30 2600 Antwerpen Berchem België	Belgium	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Nationale Bank van België (NBB) Autoriteit voor Financiële Diensten en Markten (FSMA)
Brazil Managing Director Silvo Lomnitzer			
Banco ABN AMRO Clearing S.A.	Rua Fidencio Ramos 302 Andar 11 Vila Olimpia São Paulo SP 04551-010 Brazil	Brazil	Banco Central do Brasil
ABN AMRO Clearing Corretora de Títulos e Valores Mobiliários Ltda	Rua Fidencio Ramos 302 Andar 11 Vila Olimpia São Paulo SP 04551-010 Brazil	Brazil	Banco Central do Brasil
France Country Executive Mélanie Guerrato			
ABN AMRO Bank N.V., Paris Branch	119-121 boulevard Haussmann 75008 Paris France	France	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Autorité de Contrôle Prudentiel et de Resolution (ACPR)
ABN AMRO Asset Based Finance (ABF), France Branch	39 rue Anatole France 92535 Levallois Perret cedex France	France	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autorité de Contrôle Prudentiel et de Resolution (ACPR)
ABN AMRO Investments Solutions S.A.	121 boulevard Haussmann 75008 Paris France	France	Autorité des Marchés Financiers et de Resolution (AMF)
Germany Country Executive Hans Hanegraaf			
ABN AMRO Asset Based Finance N.V., Niederlassung Deutschland	Mainzer Landstraße 1 60329 Frankfurt am Main Germany	Germany	De Nederlandsche Bank (DNB) Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Deutsche Bundesbank
ABN AMRO Bank N.V., Frankfurt Branch	Mainzer Landstraße 1 60329 Frankfurt am Main Germany	Germany	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Deutsche Bundesbank

Greece Country Executive George Arcadis			
ABN AMRO Bank N.V., Athens Branch	38, Patriarchou Ioakim St. P.C 106-75 Athens Greece	Greece	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) The Bank of Greece
Hong Kong Managing Director Paul Pealling			
ABN AMRO Clearing Hong Kong Ltd	Suites 2407 – 2409 Level 24 Three Pacific Place, 1 Queen's Road East, Hong Kong	Hong Kong	Hong Kong Securities and Futures Commission (SFC)
ABN AMRO Clearing Bank N.V., Hong Kong Branch	Suites 2407 – 2409 Level 24 Three Pacific Place, 1 Queen's Road East, Hong Kong	Hong Kong	De Nederlandsche Bank (DNB) European Central Bank (ECB) Hong Kong Monetary Authority (KHMA)
Japan Managing Director Richard Patrick Clairmont			
ABN AMRO Clearing Tokyo Co. Ltd.	39F Atago Green Hills MORI Tower 2-5-1 Atago, Minato-ku Tokyo 105-6239 Japan	Japan	Japan Financial Services Agency
Luxembourg Managing Director Claudine Goedert			
ABN AMRO Bank N.V., Luxembourg Branch	Rue Gabriel Lippman 5365 Munsbach Luxembourg	Luxembourg	De Nederlandsche Bank (DNB) European Central Bank (ECB) Autoriteit Financiële Markten (AFM) Commission de Surveillance du Secteur Financier (CSSF)
Norway Country Executive Nicolette Dijkshoorn			
ABN AMRO Bank N.V., Oslo Branch NUF	Olav V gate 5 N-0161 Oslo Norway	Norway	De Nederlandsche Bank (DNB) European Central Bank (ECB) Finanstilsynet Kredittilsynet
Singapore CEO Robert Sim			
ABN AMRO Clearing Bank N.V., Singapore Branch	77 Robinson Road, #32-01, Robinson 77 Singapore 068896	Singapore	De Nederlandsche Bank (DNB) European Central Bank (ECB) Monetary Authority of Singapore (MAS)
ABN AMRO Clearing Singapore PTE Ltd	77 Robinson Road, #32-01, Robinson 77 Singapore 068896	Singapore	Monetary Authority of Singapore (MAS)
United Kingdom Country Executive Gerben Dragt			
ABN AMRO Bank N.V., UK Branch	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	De Nederlandsche Bank (DNB) European Central Bank (ECB) Prudential Regulation Authority (PRA)
ABN AMRO Clearing London Limited	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	Financial Conduct Authority (FCA)
ABN AMRO Clearing Bank N.V., London Branch	5 Aldermanbury Square EC2V 7HR London United Kingdom	United Kingdom	De Nederlandsche Bank (DNB) European Central Bank (ECB) Prudential Regulation Authority (PRA)
United States Country Executive a.i. Bob Pooler			
ABN AMRO Clearing USA LLC	175 w Jackson Boulevard, suite 2050 Chicago IL 60604 United States of America	United States of America	Commodity Futures Trading Commission (CFTC) and Securities Exchange Commission (SEC) as primary regulators; Financial Industry Regulator Authority (FINRA) and Chicago Mercantile Exchange (CME) as self-regulatory organizations
ABN AMRO Securities (USA) LLC	303 George Street, Suite 307 New Brunswick NJ 08901 United States of America	United States of America	Financial Industry Regulator Authority (FINRA) Securities Exchange Commission (SEC) Commodity Futures Trading Commission (CFTC)
ABN AMRO Capital Markets (USA) LLC	250 Park Avenue, Suite 911 New York NY 10177 United States of America	United States of America	Financial Industry Regulator Authority (FINRA) Securities Exchange Commission (SEC) Commodity Futures Trading Commission (CFTC)