

AML-Statements

Anti-Money Laundering Acknowledgement and Global Certification Regarding Foreign Correspondents Relationships

Administrative Details	Details
Name:	Sparkasse Paderborn-Detmold (Lippische Spar- und Leihekasse) (BaFin Reg.No. 100814)
founded in:	Detmold, Germany
Registered Office:	Paulinenstraße 34, 32756 Detmold, Germany and Hathumarstr. 15-19, 33098 Paderborn, Germany www.sparkasse-paderborn-detmold.de
Business Area:	The cities of Altenbeken, Augustdorf, Bad Lippspringe, Bad Wünnenberg, Barntrup, Borch, Blomberg, Büren, Detmold, Hövelhof, Horn-Bad Meinberg, Lage, Lichtenau, Lügde, Marsberg, Paderborn, Salzkotten, Schieder-Schwalenberg, Schlangen (Kreis Lippe, Kreis Paderborn, Hochsauerlandkreis)
Outline of History	Sparkasse Paderborn-Detmold was founded on 13 th March 1786
Legal Status & Banking Licence	Sparkasse Paderborn-Detmold is a public sector bank, being inscribed in the commercial register at the Lemgo district court under No. HRA 3406 and at the Paderborn district court under No. HRA 2232
Is the bank publicly listed on a stock exchange?	No
The Board of Management:	Chairman: Arnd Paas (Vorsitzender) Members: Hubert Böddeker (stellv. Vorsitzender) Andreas Trotz (Mitglied)
Bank tax identification number	DE124617419 DE126229845
Swift / BIC	WELADE3LXXX
Number of employees	1210
Number of domestic branches	57
Our principal business activities and services are as follows:	Savings bank, universal and regional bank, corporate and private customers, Documentary Credits, Bills of exchange, Foreign exchange

Applicable laws

Is the bank subject to laws and regulations for the prevention of money laundering and the financing of terrorists?	yes
<p>Relevant laws and regulations: EU regulations and directives</p> <p>Geldwäschegesetz (GWG / GwBekErgG) [Money Laundering Prevention Law]</p> <p>Kreditwesengesetz (KWG) [Banking Law]</p> <p>Außenwirtschaftsgesetz (AWG) [Foreign Trade & Payments Law]</p> <p>Wertpapierhandelsgesetz (WPHG) [Securities Trading Law]</p> <p>Amtliche Verlautbarungen des BaFin [Official statements of BaFin]</p> <p>Sparkassengesetz NRW (SpkG NRW) [North Rhine-Westphalia Savings Banks Law]</p>	

Regulatory Authority

Is our bank subject to the supervision of any regulatory authority?	yes
<p>Name of Auditors: SVWL Sparkassenverband Westfalen Lippe Regina-Protmann-Str. 1 48159 Münster Germany</p>	
<p>Name of Regulator: Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) Graurheindorfer Str. 108 53117 Bonn Germany</p>	

AML policy and practice

Does our institution have a written policy against money laundering and terrorist financing?	Yes
Does this policy meet FATF standards?	Yes
Is the policy applicable to the headquarters, all branches and subsidiaries, including foreign branches and offices?	Yes
We verify the customer's true identity with the help of reliable, independent documentary, data and information sources and we retain all relevant documents and information relating to the customer's identity and transactions in accordance with the requirements of the regulatory authority.	Yes

Furthermore Sparkasse Paderborn-Detmold does not have any foreign branches and offices.	
Does our bank have an independent audit and/or compliance review function to test the adequacy of policy and procedures?	Yes

Operational area

Does our bank maintain a correspondent banking relationship to a shell bank or do business with a shell bank (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group)?	No
Does our institution have a policy prohibiting correspondent accounts/ relationships with shell banks?	Yes
Does our institution have policies to reasonably ensure that we will not conduct transactions with or on behalf of shell banks through any of our accounts or products?	Yes
Does our institution have policies to reasonably ensure that it only operates with correspondent banks that possess licences to operate in their countries of origin?	Yes
Does our institution obtain sufficient information to gain an understanding of our correspondents' business, reputation and regulatory history?	Yes
Are all new correspondent relationships approved by a Senior Manager?	Yes
Does our bank offer "Payable Through Accounts" or any other accounts which can transact through nostro and losstro accounts? (Payable Through Accounts are a type of correspondent banking account which is subdivided by the foreign bank into sub-accounts, each in the name of one of the foreign bank's customers, thus giving foreign bank's customers direct access to the products of the first financial institution.)	No
Does our bank maintain anonymous accounts, or numbered accounts for which we do not collect the full details of the beneficial owner?	No
Does our bank monitor customer account databases for terrorist names?	Yes
Does our institution require full details for outgoing wire transactions, i.e. sender and beneficiary names, address and account number in accordance with the requirements of the regulatory authority?	Yes
Does our institution have any restrictions under our Banking Licence e.g. is our institution only limited to conducting business with non-residents or in non-local currencies?	No

Risk management details

Has a compliance office been set up and is a compliance officer in charge of supervising and coordinating efforts against money laundering and terrorist financing as well as monitoring compliance?	Yes
Contact address: Sparkasse Paderborn-Detmold, Geldwäschebeauftragter / AML Officer, Paulinenstr. 34, 32756 Detmold, Germany	
Sparkasse Paderborn-Detmold, Geldwäschebeauftragter / AML Officer, Hathumarstr. 15-19, 33098 Paderborn, Germany	
Does our institution determine the appropriate level of enhanced and ongoing due diligence necessary for those categories of customers and transactions that we have reason to believe pose a heightened risk of money laundering and terrorist financing activities at or through our institution?	Yes
Does our institution take steps to understand the normal and expected transactions of our customers based on our risk assessment of our customers?	Yes

Has our institution implemented systems for the identification of all our customers at account opening, including verification of customer information from independent and reliable sources (e.g. name, street address, date of birth, number and type of valid official identification)?	Yes
Does our institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	Yes

AML Training

Does our institution provide AML training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving our products and services and internal policies to prevent money laundering?	Yes
Does our institution retain records of our training sessions including attendance records and relevant training materials used?	Yes
Does our institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes
Does our institution employ agents to carry out some of the functions of our institutions and if so does our institution provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms money laundering involving our institution's products and services and internal policies to prevent money laundering?	Yes

Transaction monitoring

Does our institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers cheques, money orders, etc)?	Yes
Does our institution filter payments against relevant sanctions lists?	Yes

Reportable transactions and prevention and detection of transactions with illegally obtained funds

Does our institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes
Does our institution have procedures to identify transactions structured to avoid large cash reporting requirements?	Yes
Does our institution screen transactions for customers or transactions we deem to be of significantly heightened risk (which may include persons, entities or countries that are contained on lists issued by government/ international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	Yes

Compliance status

Does our bank respect the currently valid laws and internal guidelines for the prevention of money laundering and the financing of terrorists?	Yes
Has our institution been involved in any regulatory or criminal enforcement actions resulting from violations of laws or regulations against money laundering and terrorist financing in the past 5 years?	No