the Wolfsberg Group

Financial Institution Name: Location (Country): Nederlandse Waterschapsbank N.V. The Netherlands

No#	Question	Answer
	& OWNERSHIP	Allower
1. ENTIT	Full Legal name	In the second se
•	ruii Legai name	Nederlandse Waterschapsbank N.V. (NWB Bank)
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	N/A - NWB Bank does not have any branches
3	Full Legal (Registered) Address	Rooseveltplantsoen 3 2517 KR The Hague The Netherlands
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	5 May 1954
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
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	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No V
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	JLP5FSPH9WPSHY3NIM24
2. AML C	TF & 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	Not Applicable
11 e	CDD	Yes
11 f	EDD	Yes

Policies and Procedures Yes	11 g	Independent Testing	Yes	
11 PEP Streening			Yes	
11 N. Risk Assessment 11 O. Suspicious Activity Reporting 12 Suspicious Activity Reporting 13 O. Transaction Monitoring 13 Does the Entity a Mil. CTF & Sanctions policy approved at least anniably by the Board or equivalent Senior Management Committee or corry out any components of its Mil. CTF & Sanctions programme? 13 O. Does the Entity use third parties to carry out any components of its Mil. CTF & Sanctions programme? 13 O. Does the Entity to see the parties to carry out any components of its Mil. CTF & Sanctions programme? 14 Dees the entity have a whistlebibower policy? 15 Has the Entity of Committee of Policies and procedures consistent with applicable ABC registations and requirements to reasonably prevent, detect and report to tribery and complom? 16 Does the Entity is internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to the Entity is internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 18 Description and Senior Committee Management Provides Senior Procedures Senior Proce	11 i	Policies and Procedures	Yes	
11 Sanctions		PEP Screening	Yes	\mathbf{V}
11 m	11 k	Risk Assessment	Yes	
11 n	11 I	Sanctions	Yes	V
Transcaction Mentering Yes	11 m	Suspicious Activity Reporting	Yes	lacksquare
12 Is the Entity's AML, CTF & Sanctions policy approved a least ammally by the Board or equivalent Sanfor Management Committee? 13 Opes the Entity use third parties to carry out any components of its AML, CTF & Sanctions programms? 13 a If Y, provide further details 14 Does the entity have a whistletiower policy? 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and report bribary and corruption? 16 Does the Entity is documented policies and procedures consistent with applicable ABC regulations and report bribary and corruption? 16 Does the Entity's provide mandatory ABC training to: 17 Does the Entity provide mandatory ABC training to: 17 a Board and Senior Committee Management 18 title of Defence 19 a Stall Line of Defence 17 d Stall Line of Defence 18 a Manual Stall Line of Defence 19 a Provides as appropriate (compliance activities subject to ABC risk have been outsourced by subject to ABC risk have been outsourced by contractors/consultants) 18 a Money Issundering 19 a Provide the ABC Terit Stanctions regulations and requirements to reasonably prevent, detect and report: 19 a Provide the ABC TER Stanctions regulations and requirements to reasonably prevent, detect and report: 19 a Provide the Opening and keeping of anonymous and facilities named accounts for curliciensed banks and of NBFIs 19 a Provide the opening and keeping of accounts for curliciensed banks and of NBFIs 19 a Provide to depening and keeping of accounts for any of unificiensed branks and of NBFIs 19 a Provide to depening and keeping of accounts for curliciensed banks and of NBFIs 19 a Provide to depening and keeping of accounts for any of unificiensed branks and of NBFIs 19 a Provide to depening and keeping of accounts for any of unificiensed branks and of NBFIs 19 a Provide to depening and keeping of accounts for any of unificiensed branks and of NBFIs 19 a P	11 n	Training and Education	Yes	
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sanctions, PEPs and Adverse Media/Negative Yes		risk issues/potentially suspicious activity identified	Yes	•
	19 j		Yes	•

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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	lacksquare
21 a	If Y, what is the retention period?	5 years or more	•
5. KYC, 0	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	\blacksquare
24 b	Expected activity	Yes	
24 c	Nature of business/employment	Yes	V
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 runds Source of wealth	Yes	
25		100	_
25 25 a	Are each of the following identified:	Vec	_
	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?	No	•
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	No	
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	Do not have this category of customer or industry	
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 с	Embassies/Consulates	Do not have this category of customer or industry	\blacksquare
30 d	Extractive industries	Do not have this category of customer or industry	V
30 e			V
	Gambling customers	Do not have this category of customer or industry	
30 f	General Trading Companies	Do not have this category of customer or industry	•
30 g	Marijuana-related Entities	Do not have this category of customer or industry	\blacksquare
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	T
30 j	Non-Government Organisations	Do not have this category of customer or industry	V
30 k			
1 ^{30 ^}	Non-resident customers	Do not have this category of customer or industry	\blacksquare

	T	
Nuclear power	Do not have this category of customer or industry	
Payment Service Providers	Do not have this category of customer or industry	
PEPs	EDD on risk-based approach	
PEP Close Associates	EDD on risk-based approach	
PEP Related	EDD on risk-based approach	V
Precious metals and stones	Do not have this category of customer or industry	
Red light businesses/Adult entertainment	Do not have this category of customer or industry	V
Regulated charities	Do not have this category of customer or industry	V
	Prohibited	
·		V
<u> </u>		T
		V
	,	
Cutor (opcomy)	the public sector (Art. 2.1 of the Articles of Association). 30i: NWB Bank does not serve occasional customers but not all customers have NWB accounts.	<
If restricted, provide details of the restriction		
ORING & REPORTING	<u> </u>	
and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
If manual or combination selected, specify what type of transactions are monitored manually		
Does the Entity have regulatory requirements to report suspicious transactions?	Yes	
If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	•
Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
NT TRANSPARENCY		
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	V
Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
FATF Recommendation 16	Yes	
Local Regulations	Yes	
If Y, Specify the regulation	EU: WTR2 NL: Wwft	
If N, explain		
IONS		
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	•
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	•
	Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction ORING & REPORTING Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? What is the method used by the Entity to monitor transactions for suspicious activities? If manual or combination selected, specify what type of transactions are monitored manually Does the Entity have regulat ory requirements to report suspicious transactions? If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? NT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations If Y, Specify the regulation If N, explain If N, explain 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? 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	Pegre Service Providers PEPS (1909 Associates 1900 on risk-based approach 1900 on risk

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	Y
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 tran	~
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 tran	▼
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data	•
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tran	V
41 e 41 f	Lists maintained by other G7 member countries Other (specify)	Used for screening customers and beneficial owners (i.e. reference data National sanctionslist terrorism (the Netherlands)	Y
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. TRAININ	NG & EDUCATION		
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	V
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	\equiv
44 b	1st Line of Defence		Y
44 c	2nd Line of Defence		7
44 d 44 e	Third parties to which specific FCC activities have		▼
44 f	been outsourced	<u></u>	=
	Non-employed workers (contractors/consultants)	No	V
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	~
	oup Financial Crime Compliance Questionnaire 2023 (FCCQ Waterschapsbank N.V. (NWB Bank)	V1.2)(Financial Institution name)	
I, understood th declaration, th		pliance Manager- Second Line representative), certify that I have read and the early contact to my honest belief.	1
2023			
02 jun	i 2023	(Signature & Date)	