

Full name of bank/financial institution: Intermarket Bank AG	
Location/Registered address: Am Belvedere 1, A-1100 Vienna, Austria	
Telephone and web address: +43 (0) 50 100 28900, <a href="http://www.intermarket.at">www.intermarket.at</a>	
Registration no.: 94144y; Registration Court: Commercial Court of Vienna	
Management	Mr. Sebastian ERICH, Chairman of the Management Board e-mail: <a href="mailto:sebastian.erich@intermarket.at">sebastian.erich@intermarket.at</a>  Mr. Mag. Patrick GÖTZ, Member of the Management Board e-mail: <a href="mailto:patrick.goetz@intermarket.at">patrick.goetz@intermarket.at</a>

<b>ANTI MONEY LAUNDERING QUESTIONNAIRE</b> containing all questions of "The Wolfsberg Group Anti-Money Laundering Questionnaire 2014"			
I. GENERAL AML POLICIES, PRACTICES AND PROCEDURES	Yes	No	Other Information
1. Is the AML compliance program approved by the FI's Board or a senior committee thereof?	X		
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	X		
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	X		
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	X		
5. Does the FI have a policy prohibiting accounts/relationships with shell banks (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.)?	X		
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	X		
7. Does the FI have policies covering relationships with <i>Politically Exposed Persons</i> (PEP's, definition: see below), their <i>immediate family members</i> or known persons close to them consistent with industry best practices?	X		
8. Does the FI have appropriate record retention procedures that comply with applicable law?	X		
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?		X	Our FI has no branches and/or subsidiaries

II. RISK ASSESSMENT	Yes	No	Other Information
10. Does the FI have a risk focused assessment of its client base and transactions of its clients?	X		
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of clients and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	X		
III. KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE	Yes	No	Other Information
12. Has the FI implemented processes for the identification of its clients/ of those clients on whose behalf it maintains or operates accounts or conducts transactions?	X		
13. Does the FI have a requirement to collect information regarding its clients' business activities?	X		
14. Does the FI assess its FI clients' AML policies or practices?	X		
15. Does the FI have a process to review and, where appropriate, update client information relating to high risk client information?	X		
16. Does the FI have procedures to establish a record for each client noting their respective identification documents and KYC information collected at a start of business relationship?	X		
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its clients based on its risk assessment of its clients?	X		
IV. Reportable Transactions and Prevention/Detection of Transactions with Illegally Obtained Funds	Yes	No	Other Information
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X		
19. Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?			X No, our FI doesn't operate cash transactions
20. Does the FI screen clients and transactions against lists of persons, entities or countries issued by government/competent authorities?	X		
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	X		
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? <sup>1</sup>	X		
V. Transaction Monitoring	Yes	No	Other Information
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (such as traveler checks, money orders, etc.)?			X No, our FI doesn't operate cash transactions, see additional letter

VI. AML TRAINING	Yes	No	Other Information
24. Does the FI 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 the FI's products and services as well as internal policies to prevent money laundering?	X		
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X		
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X		
27. Does the FI employ third parties to carry out some of the functions of the FI and if YES: Does the FI provide AML training to relevant third parties that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	X		

1: SWIFT MT 202/202COV and MT 205/205COV The four payment message standards to be observed are: i) FIs should not omit, delete or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIS should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/Wolfsberg\\_NYCH\\_Statement\\_on\\_Payment\\_Message\\_Standards\\_\(2007\).pdf](http://www.wolfsberg-principles.com/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

### Additional Information from Intermarket Bank AG

Our company's place of incorporation is also the seat of our company's central administration.  
Our principal activity is FACTORING. We wish to conduct our factoring business at our own expense.

Vienna, 28.03.2017

Place, date

**Intermarket Bank AG**  
Am Belvedere 1  
1100 Wien

Intermarket Bank AG (official signature)

### DEFINITIONS:

- **Politically Exposed Persons** are those natural persons who hold **important public offices** or have held such an office until one year ago, their **immediate family members** or **persons known to be close associates** to them.
- **Important Public Offices'** includes the following:
  - Head of State, Head of Government, Minister and deputy or assistant ministers, Secretary of State; Members of Parliament or of similar legislative bodies;
  - members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances;
  - ambassadors, chargés d'affaires and high-ranking officers in the armed forces;
  - members of the administrative, management or supervisory bodies of State-owned enterprises. This also applies to positions at the community level and in international organizations.
  - members of the governing bodies of political parties
  - members of courts of auditors or of the boards of central banks

No public function referred to in the above points shall be understood as covering middle-ranking or more junior officials.

• **Immediate Family Members** include the following:

- Spouses and partners with the same spousal rights according to the respective country's laws;
- The children and their spouses or their partners with the same spousal rights according to the respective country's laws; the parents

• **persons known to be close associates** means:

- (a) natural persons who are known to have joint beneficial ownership of legal entities or legal arrangements, or any other close business relations, with a politically exposed person
- (b) natural persons who have sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the de facto benefit of a politically exposed person

• **offshore-cooperate** means post-office box companies in offshore-zones without physical presence and without operative business in the respective/registered country.

• **(ultimate) beneficial owners** of a company are all natural persons who ultimately own or control the company. Basically this includes any natural person who directly or indirectly holds more than 25% of the shares in the company or exercises business leadership control in any other way.