

# the Wolfsberg Group

Financial Institution Name:  
Location (Country):


Danske Bank A/S  
Denmark

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	Danske Bank A/S
2	Append a list of foreign branches which are covered by this questionnaire	This questionnaire covers Danske Bank A/S including the branches in Finland, Sweden, Norway, Ireland, UK, Poland, and the list of subsidiaries in the appendix below. It should be noted that even though this FCCQ questionnaire is applicable for the Danske Bank Group, including its branches and subsidiaries, due to the nature and field of business of each and every subsidiary within the Danske Bank Group, some answers might not be fully applicable for every subsidiary and exclusions might occur.
3	Full Legal (Registered) Address	Holmens Kanal 2-12, 1092, København K, Denmark
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	October 5th, 1871
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	NASDAQ Copenhagen, Ticker DANSKE
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
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
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	MAES062Z2104RZ2U7M96
<b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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

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 uses law firms, consultants, external service providers (only as allowed by regulation) to undertake specific actions related to the Programme or occasionally to supplement the existing operations. Third parties provide lists of sanctioned parties as well as politically-exposed persons on a subscription basis.
14	Does the entity have a whistleblower policy?	Yes
<b>3. ANTI BRIBERY &amp; CORRUPTION</b>		
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	Not applicable
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes
<b>4. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>		
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
<b>5. KYC, CDD and EDD</b>		
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	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	Restricted
30 b	Respondent Banks	Always subject to EDD
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	Restricted
30 d	Extractive industries	Restricted
30 e	Gambling customers	Restricted
30 f	General Trading Companies	No EDD/restriction or prohibition
30 g	Marijuana-related Entities	Restricted
30 h	MSB/MVTS customers	Restricted
30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	Restricted
30 k	Non-resident customers	EDD on risk-based approach

30 l	Nuclear power	Restricted
30 m	Payment Service Providers	Restricted
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	Restricted
30 r	Red light businesses/Adult entertainment	Restricted
30 s	Regulated charities	Restricted
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	No EDD/restriction or prohibition
30 v	Unregulated charities	Restricted
30 w	Used Car Dealers	No EDD/restriction or prohibition
30 x	Virtual Asset Service Providers	Restricted
30 y	Other (specify)	Crowdfunding, auction houses, trading in dual use goods, fishing industries and cargo shipping are also restricted. Where "No EDD/restriction or prohibition" was selected, based on standard controls applied, where FC concerns are identified, EDD will be performed.
31	If restricted, provide details of the restriction	Restricted customers are subject to EDD and may be on-boarded, or completed as part of ongoing due diligence, only with prior approval of Senior Managers.
<b>6. MONITORING &amp; REPORTING</b>		
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	Suspicious activity monitoring is automated, however, manual methods are used to monitor customer activity as part of periodic review and for red flags in trade finance activities. Additionally, the entire Bank has an obligation to raise a suspicion of unusual activity for investigation.
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
<b>7. PAYMENT TRANSPARENCY</b>		
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	Yes
37 b1	If Y, Specify the regulation	Directive (EU) No. 2015/849 (4th AMLD), 2018/843 (5th AMLD) Regulation (EU) 2015/847, and local implementing acts including "The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations".
37 c	If N, explain	
<b>8. SANCTIONS</b>		
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)	U.S. Financial Crimes Enforcement Network (FinCEN) 311 Special Measures; Finnish National Bureau of Investigation List of Decisions to Freeze Funds (Luettelo Keskusrikospoliisin tekemistä jäädyttämisspäätöksistä); Polish Sanction List
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
<b>9. TRAINING &amp; EDUCATION</b>		
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
<b>10. AUDIT</b>		
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
<b>Signature Page</b>		
Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)		
Danske Bank A/S _____ (Financial Institution name)		
I, <u>Monika Wieczorkowska</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.		
 _____ (Signature & Date) <u>12/03/2024</u>		

Appendix for subsidiaries covered by this questionnaire:

Danica Pension, Livsforsikringsaktieselskab

Danske Hypotek AB

Danske Invest Fund Management Ltd

Danske Invest Management A/S

Danske Leasing A/S

Danske Invest Asset Management AS

Danske Markets Inc.

Danske Mortgage Bank Plc

Danske Private Equity A/S

Northern Bank Limited

Realkredit Danmark A/S