

## Anti-Money Laundering and Counter Financing of Terrorism Policy Statement, Know Your Customer Policy Statement and FATCA Status

### A. Basic Information

#### Our full legal name and address

Kreissparkasse Esslingen-Nürtingen  
Bahnhofstr. 8  
73728 Esslingen  
Germany  
phone: +49 (0)711 - 398 5000, fax: +49 (0) 711 - 398 5100  
mail to: [cb@sibwn.de](mailto:cb@sibwn.de)  
BIC/SWIFT: ESSL DE 66 XXX  
web: [www.ksk-es.de](http://www.ksk-es.de), short version in English: [www.ksk-es.de/international](http://www.ksk-es.de/international)

#### Type of business and activity

We are a savings bank and a leading regional bank for private customers and especially for medium-sized companies in the district of Esslingen.

#### Board of Managing Directors

Burkhard Wittmacher (Chairman of the Board of Management)  
Kai Scholze (Vice Chairman of the Board of Management)  
Frank Dierolf (Member of the Board of Management)

Not any Board Member is a Politically Exposed Person (PEP).  
All Board Members are German Citizens.

#### Shareholder & Foundation

Kreissparkasse Esslingen has been 100% owned by the District of Esslingen (state owned) since it was founded in 1848. We are incorporated under public law.

#### Name of our regulators, registration number, tax identification no.

Supervisory authority responsible for the authorisation:  
Europäische Zentralbank, Sonnemannstraße 20, 60314 Frankfurt am Main,  
(Internet: [www.ecb.europa.eu](http://www.ecb.europa.eu))

Supervisory authority responsible for consumer protection:  
Bundesanstalt für Finanzdienstleistungsaufsicht, Graurheindorfer Straße 108, D-53117 Bonn,  
Marie-Curie-Straße 24-28, D- 60439 Frankfurt am Main, ([www.bafin.de](http://www.bafin.de))

Commercial Register: HRA 212120, Tax Identification No: DE145340149  
BaFin ID: 100528

Öffentlich-rechtliches  
Kreditinstitut  
Vorsitzender des  
Verwaltungsrats:  
Landrat Heinz Eininger

Vorstand:  
Burkhard Wittmacher  
(Vorsitzender)  
Kai Scholze (Stv. Vorsitzender)  
Frank Dierolf

Bahnhofstraße 8  
73728 Esslingen  
Telefon 0711 398-5000  
Telefax 0711 398-5100  
[kundenservice@ksk-es.de](mailto:kundenservice@ksk-es.de)  
[www.ksk-es.de](http://www.ksk-es.de)

BIC/SWIFT: ESSLDE66XXX  
Bankleitzahl: 611 500 20  
HRA Stuttgart 212120  
Steuer-Nr.: 59316/00214  
USt-ID: DE145340149

Partner von:  
Deka  
Deutsche Leasing  
Landesbausparkasse  
Sparkassen-Versicherung

## **Accountant**

Sparkassenverband Baden-Württemberg  
Am Hauptbahnhof 2, D-70173 Stuttgart / Germany

## **B. Legal Framework, Corporate Governance**

Our country established laws designed to prevent money laundering and terrorist financing and our institution is subject to such laws. Our institution established written policies designed to combat money laundering and terrorist financing, including measures to obtain information about the true identity of our customers. The policy is applicable to the headquarter and all branches.

Our KYC-Policy is based on and includes

- German law and the regulations of our institution prohibit the opening and maintenance of anonymous or numbered accounts
- We have an electronic system for the assessment of the transactions of our customers
- We screen customers and transactions against lists of persons, entities or countries issued by OFAC (USA), UN, EU and Federal Republic of Germany
- We have no business relationship with casinos

Our AML-Policy is also based on

- Guidelines issued by the FATF (Germany is a FATF member country)
- “Directive of the Council of the European Communities on the prevention of the use of the financial system for the purpose of money laundering” (Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 and the following Directives)
- The “German Money Laundering Act” (Geldwäschegesetz)
- Relevant guidelines issued by the Federal Banking Supervisory Office (“Bundesanstalt fuer Finanzdienstleistungsaufsicht”) as banking supervision authority in Germany
- German Banking Act (Kreditwesengesetz)

We have not been subject of any civil or criminal enforcement actions resulting from violations of anti-money laundering regulation.

## **C. Through Accounts, correspondent banks, branches or subsidiaries abroad**

We do not allow direct use of our correspondent accounts by third parties to transact business on their own behalf (i.e. payable-through accounts). We do not maintain any foreign branches or subsidiaries. We only co-operate with correspondent banks that are properly licensed.

We have not correspondent banks in Iran, Democratic People’s Republic of Korea, Syria and Sudan.

#### **D. FATCA Status**

We confirm that we are compliant to FATCA regulations and have completed our FATCA registration process. We are registered on IRS with the status:

Registered deemed compliant FFI, Model 1 IGA

Our Global Intermediary Identification Number (GIIN) is as follows:

4IBWLZ.99999.SL.276

#### **E. Wolfsberg Questionnaire**

The Wolfsberg Group Anti-Money Laundering Questionnaire completed by us on 29 November 2022 constitutes an essential part of our Anti Money Laundering policy and obtains information about

- General AML Policies, Practices and Procedures
- Risk Assessment
- Know Your Customer, Due Diligence and Enhanced Due Diligence
- Reportable Transactions and Prevention and Detection of Transactions with Illegally obtained Funds
- Transaction Monitoring
- AML Training

#### **Chief Anti-Money-Laundering:**

Mr. Michael Aspacher  
mail to: michael.aspacher@ksk-es.de

Date and Signature: 01 January 2023

  
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Carolin Kopp  
Head of International Division

  
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Martin Veile  
Director Banking Operations and Int. Payments /  
Referent Correspondent Banking