

AML/KYC/CFT Questionnaire

Financial Institution Name: **State Bank of India Frankfurt Branch, Germany**
Location (Country) : **Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany**

No.	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	State Bank of India Frankfurt Branch (SBI Ffm)
2	Append a list of branches which are covered by this questionnaire	Questionnaire applicable for: State Bank of India Frankfurt Branch Germany
3	Full Legal (Registered) Address	Mainzer Landstraße 61 60329 Frankfurt am Main Germany
4	Full Primary Business Address (if different from above)	--
5	Date of Entity incorporation/ establishment	14 th November 1974
6	Type of licence, licence number, issuing body	General banking license no. II Bb-1043 dated 14 November 1974 Issued by the local supervisory authority (BaFin) Bundesanstalt für Finanzdienstleistungsaufsicht
7	Country of Incorporation	Federal Republic of Germany
8	Principle line of business	Commercial banking, incl. trade finance
9	Main business areas applicable to the Entity	Commercial Banking Transactional Banking Corporate Banking Trade Finance & Guarantee Credit & Syndication
10	National regulatory authority	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) - German Federal Financial Supervisory Authority Graurheindorferstr. 108, 53117 Bonn, Germany
11	Number of branches	State Bank of India Frankfurt has no branches

12	Does the Entity operate under an Offshore Banking License (OBL)	No
13	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where offshore means not domiciled in the jurisdiction where bank services are being provided) ?	No
14	Branch Management members	Mister Raghavan Sriraman (CEO) Mister Bernd Meist (JCEO)
14a	Are Politically Exposed Persons members of the branch management?	No
15	Number of employees	Approx. 50
16	Name of external auditor	Mazars GmbH & CO. KG Wirtschaftsprüfungsgesellschaft Germany
17	Ultimate Parent / Legal status	Full branch of State Bank of India Mumbai listed at the National Stock Exchange of India (ISIN: INE062A01020)
18	Ownership	Central Government of India (approx. 60%) Life Insurance Corporation of India (approx. 10%)
19	Provide Legal Entity Identifier (LEI) if available	5493001JZ37UBBZF6L49
20	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
2. PRODUCTS & SERVICES		
21	Does the Entity offer the following products and services:	--
21a	Correspondent Banking	Yes
21a1	If Yes	--

21a2	Does the Entity offer Correspondent Banking services to domestic banks?	Correspondent Banking service provided to SBI group members and selected, approved banks from India
21a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
21a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
21a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
21a6	Does the Entity allow downstream relationships with Foreign Banks?	No
21a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
21a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No such accounts available at branch
21a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
21a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	Yes, but not applicable as no such accounts available at branch
21b	Private Banking (domestic & international)	Yes (very limited)
21c	Trade Finance	Yes
21d	Payable Through Accounts	No
21e	Stored Value Instruments	No
21f	Cross Border Bulk Cash Delivery	No
21g	Domestic Bulk Cash Delivery	No

21h	International Cash Letter	No
21i	Remote Deposit Capture	No
21j	Virtual /Digital Currencies	No
21k	Low Price Securities	No
21l	Hold Mail	No
21m	Cross Border Remittances	Yes
21n	Service to walk-in customers (non-account holders)	Yes (very limited, and only under fulfilment of the enhanced security measures explicitly set up for this customer/client group)
21o	Sponsoring Private ATMs	No
21p	Other high-risk products and services identified by the Entity	Accounts / Transactions of Consulate and Embassy members and relatives (high-risk clients and PEP's). -Enhanced security measures explicitly for this client group set up /available
22	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
3. AML, CTF & SANCTIONS PROGRAMME		
23	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	--
23a	Appointed Officer with sufficient experience/expertise	Yes
23b	Cash Reporting (as far as required)	Yes
23c	CDD	Yes
23d	EDD	Yes
23e	Beneficial Ownership	Yes

23f	Independent Testing	Yes
23g	Periodic Review	Yes
23h	Policies and Procedures	Yes
23i	Risk Assessment	Yes
23j	Sanctions	Yes
23k	PEP Screening	Yes
23l	Adverse Information Screening	Yes
23m	Suspicious Activity Reporting	Yes
23n	Training and Education	Yes
23o	Transaction Monitoring	Yes
24	How many fulltime employees are in the Entity's AML, CTF & Sanctions Compliance Dept. ?	3
25	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes (approved by branch management and corporate centre)
25a	Is the AML compliance program subject to periodic review?	Yes (at least annual review)
25a1	Does your FI have a legal and regulatory compliance program that includes a designated officer responsible for coordinating and overseeing the AML framework?	Yes
25a2	Has your FI developed written policies documenting the processes in place to prevent, detect and report suspicious transactions?	Yes
25a3	In addition to inspections by the government supervisors/ regulators, has your FI an internal audit function or other independent third-party assessing AML policies and practices on a regular basis?	Yes

25a4	Does the FI have a policy prohibiting accounts or relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence)	Yes (relationship with shell banks prohibited)
25a5	Do the laws and regulations in your jurisdiction prohibit your institution from opening anonymous accounts?	Yes
25a6	Are precious metal or gem traders/exchangers in your customer base?	No
25a7	Does your FI have record retention procedures that comply with applicable law? If Yes, how long are records retained?	Yes 10 years
25a8	Do you conduct business with non-established customers or walk-ins? If yes, does your institution have customer identification requirements for such customers for the sale of monetary instruments or wire transfers? <u>Kindly specify threshold:</u>	Yes Yes Threshold: 1 €
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26a	If Y, provide further details	Not applicable
27	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are Representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
27a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	Not applicable
27b	If appropriate, provide any additional information / context to the answers in this section.	Additional details (if any) provided in further course of this document

4. ANTI BRIBERY & CORRUPTION (ABC)		
28	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
29	Does the Entity have an enterprise-wide programme that sets minimum ABC standards?	Yes
30	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
31	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
32	Is the Entity's ABC programme applicable to:	--
32a	Joint ventures	Yes
32b	Third parties acting on behalf of the Entity	No such relationship available at SBI Frankfurt branch
33	Does the Entity have a global ABC policy that:	--
33a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
33b	Includes enhanced requirements regarding interaction with public officials?	Yes

33c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
34	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
35	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
36	Does the Entity perform an Enterprise-wide ABC risk assessment?	Yes
36a	If Y select the frequency	At least annually
37	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
38	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	--
38a	Potential liability created by intermediaries and other third-party providers as appropriate	Not applicable
38b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes (business mainly conducted within Europe and India)
38c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
38d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes

38e	Changes in business activities that may materially increase the Entity's corruption risk	Yes (no such situation occurred in the past years)
39	Does the Entity's internal audit function or other independent third-party cover ABC Policies and Procedures?	Yes
40	Does the Entity provide ABC training to:	
40a	Board and Senior Committee Management	Yes
40b	1st Line of Defence	Yes
40c	2nd Line of Defence	Yes
40d	3rd Line of Defence	Yes, as far as the 3 rd line of defence is located inhouse. See next question for more details.
40e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not applicable with the following exception: Internal Audit Function outsourced to renowned (top 5) auditing firm as an additional measure for combating ABC and crosscheck of the ABC standard at branch
40f	Non-employed workers as appropriate (contractors/consultants)	No. Contractors/consultants are only used by the Branch in exceptional cases. These are mainly employees of companies with which the branch has a contractual relationship (e.g. licensed software products or law firms). No Freelancers consulted by branch.
41	Does the FI provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
42	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches

5. POLICIES & PROCEDURES		
43	Has the FI documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	--
43a	Money laundering	Yes
43b	Terrorist financing	Yes
43c	Sanctions violations	Yes
44	Are the Entity's policies and procedures updated at least annually?	Yes
45	Are the Entity's policies and procedures gapped against/ compared to:	--
45a	US Standards	Yes
45b	EU Standards	Yes
46	Does the Entity have policies and procedures that:	--
46a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
46b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
46c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
46d	Prohibit accounts/relationships with shell banks	Yes
46e	Prohibit dealing with another entity that provides services to shell banks	Yes
46f	Prohibit opening and keeping of accounts for Section 311 designated entities (OFAC-Notice on Special Measures against Specified Entities)	Yes

46g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance, exchanges houses, agents, casa de Cambio, Bureaux de change or money transfer agents	Yes
46h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
46i	Define escalation processes for financial crime risk issues	Yes
46j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
46k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Instructions for employees in place to summarize and communicate potentially suspicious activities to the AML-Officer and/or the Compliance Officer for onward needs. This include the possibility of using the Whistle-Blower guidelines available at branch.
46l	Outline the processes regarding screening for sanctions, PEPs and negative media	Examples: -AML related software products in place -Sanction related software products in place -Investigation tools in place -Onboarding process in place covering approval, adverse media, sanction and other applicable regulations/needs -Country specific inhouse policies in place to be adhered by all employees -Customer risk classification in place incl. monitoring based on customer transactions and customer behaviour -Business relationship termination instructions
46m	Outline the processes for the maintenance of internal "watchlists"	Internal watchlist in place (part of the sanction related software product at branch). Changes/requirements monitored and performed by the AML-Officer.
47	Does the Entity have a record retention procedures that comply with applicable laws?	Yes

47a	If Y, what is the retention period?	As per statutory regulations and inhouse guidelines. The period depends on the individual topic and associated guidelines (between 3 and 30 years). AML related documentation is retained for 10 years.
48	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
6. AML, CTF & SANCTIONS RISK ASSESSMENT		
49	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	--
49a	Client	Yes
49b	Product	Yes
49c	Channel (Communication Channel)	Yes
49d	Geography	Yes
50	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	--
50a	Transaction Monitoring	Yes
50b	Customer Due Diligence	Yes
50c	PEP Identification	Yes
50d	Transaction Screening	Yes
50e	Name Screening against Adverse Media & Negative News	Yes
50f	Training and Education	Yes
50g	Governance	Yes
50h	Management Information	Yes

51	Has the Entity's AML & CTF EWRA (Risk Assessment) been completed in the last 12 months?	Yes (subject to at least annual review)
51a	If N, provide the date when the last AML & CTF EWRA was completed.	Not applicable
52	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	--
52a	Client	Yes
52b	Product	Yes
52c	Channel (Communication Channels)	Yes
52d	Geography	Yes
53	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	--
53a	Customer Due Diligence	Yes
53b	Transaction Screening	Yes
53c	Name Screening	Yes
53d	List Management	Yes
53e	Training and Education	Yes
53f	Governance	Yes
53g	Management Information	Yes
54	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes (subject to at least annual review)
54a	If N, provide the date when the last Sanctions EWRA was completed.	Not applicable
55	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches

55a	If appropriate, provide any additional information / context to the answers in this section:	--
55a1	Does the FI take reasonable steps to obtain information relevant to assess and mitigate money laundering risks associated with your bank's correspondent accounts for other foreign banks (i.e., nested correspondent bank activity, origin of funds)?	Yes
55a2	Is your institution's Anti Money Laundering Policy consistent with FATF recommendations?	Yes
55a3	Do you have a USA Patriot Act Certification?	Yes (our corporate centre maintains such a certificate valid for foreign offices). If required, please contact: SBI, (GM) Global Markets Unit, Kolkatta or visit the website https://sbi.co.in
55a4	Do you scan your customers, accounts and any kind of transaction against OFAC sanction list?	Yes
55a5	Do you scan your customers, accounts and any kind of transactions against EU sanctions lists?	Yes
55a6	Do you scan your customers, accounts and any kind of transactions against UN sanctions lists?	Yes
7. KYC, CDD and EDD		
56	Does the Entity verify the identity of the customer?	Yes
57	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 (at the time of onboarding and in the course of customer data renewal)
58	Which of the following does the Entity gather and retain when conducting CDD?	--
58a	Ownership structure	Yes

58b	Customer identification	Yes
58c	Expected activity	Yes
58d	Nature of business/employment	Yes
58e	Product usage	Yes
58f	Purpose and nature of relationship	Yes
58g	Source of funds	Yes
58h	Source of wealth	Yes (as far as applicable = considering the products used by the customer)
59	Are each of the following identified:	--
59a	Ultimate beneficial ownership	Yes
59a1	Are ultimate beneficial owners verified?	Yes, as far as possible
59b	Authorised signatories (where applicable)	Yes
59c	Key controllers	Yes
59d	Other relevant parties	Yes, like shareholding structure etc.
60	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	25%
61	Does the due diligence process result in customers receiving a risk classification?	Yes
62	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	--
62a	Product Usage	Yes
62b	Geography	Yes
62c	Business Type/Industry	Yes
62d	Legal Entity type	Considered

62e	Adverse Information	Considered
62f	Other (specify)	Limited products offered by the Branch. The risk classification is mainly based on the products offered which are equipped with various security measures per product. Legal restrictions (like PEP's and high-risk countries) lead to respective high-risk classification irrespective of the product.
63	Does the Entity have a risk-based approach to screening customers for adverse media/negative news?	Yes
64	If Y, is this at:	--
64a	Onboarding	Yes
64b	KYC renewal	Yes
64c	Trigger event	Yes
65	What is the method used by the Entity to screen for adverse media / negative news?	--
65a	Automated	Yes, as far as information available in software used (Compliance Catalyst = Moody's)
65b	Manual	Yes
65c	Combination of automated and manual	Yes
66	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
67	If Y, is this at:	--
67a	Onboarding	Yes
67b	KYC renewal	Yes
67c	Trigger event	Yes

68	What is the method used by the Entity to screen PEPs?	--
68a	Automated	Yes
68b	Manual	No
68c	Combination of automated and manual	No
69	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
70	Does the Entity have a process to review and update customer information based on:	--
70a	KYC renewal	Yes
70b	Trigger event	Yes
71	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
72	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?	--
72a	Non-account customers	Yes (EDD)
72b	Offshore customers	Yes (EDD if such customer would apply for any business relationship)
72c	Shell banks	Business relationship with shell banks prohibited by law
72d	MVTS/ MSB - Money or Value Transfer Services / Money Services Business customers	Yes (EDD)

72e	PEPs	Yes (EDD)
72f	PEP Related	Yes (EDD)
72g	PEP Close Associate	Yes (EDD)
72h	Correspondent Banks	Yes (EDD) for banks outside SBI group
72h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles	A detailed questionnaire is obtained and assessed
72i	Arms, defence, military	Yes (EDD if such customer would apply for any business relationship)
72j	Atomic power	Yes (EDD if such customer would apply for any business relationship)
72k	Extractive industries	Yes (EDD if such customer would apply for any business relationship)
72l	Precious metals and stones	Yes (EDD if such customer would apply for any business relationship)
72m	Unregulated charities	Yes (EDD if such customer would apply for any business relationship)
72n	Regulated charities	Yes (EDD if such customer would apply for any business relationship)
72o	Red light business / Adult entertainment	Such customers / transactions are not accepted
72p	Non-Government Organisations	Yes, depending on the structure and involved persons of such a client
72q	Virtual currencies	Such customers / transactions are not accepted
72r	Marijuana	Such customers / transactions are not accepted
72s	Embassies/Consulates	Yes
72t	Gambling	Such customers / transactions are not accepted
72u	Payment Service Provider	Yes (EDD if such customer would apply for any business relationship)
72v	Other (specify)	NIL
73	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes

74	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
8. MONITORING & REPORTING		
75	Does the Entity have risk-based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
76	What is the method used by the Entity to monitor transactions for suspicious activities?	
76a	Automated	Yes
76b	Manual	Yes
76c	Combination of automated and manual	Yes
77	If manual or combination selected, specify what type of transactions are monitored manually	Cash deposits of walk-in customers based on generated reports. Very limited number of such customers/ transactions available at branch. Currently no such transaction processed (branch suspended processing such transactions indefinitely).
78	Does the Entity have regulatory requirements to report currency transactions?	No
79	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
80	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches

9. PAYMENT TRANSPARENCY		
81	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
82	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	--
82a	FATF Recommendations	Yes
82b	Local Regulations	Yes
82b1	Specify the regulation	All regulations, acts and guidelines in Germany related to AML/KYC/CFT
83	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
84	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
85	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
86	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	<p>Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany</p> <p>State Bank of India Frankfurt has no branches</p>

10. SANCTIONS		
87	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
88	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes Own customers are monitored and customer background details available/obtained Only renowned bank customers are accepted
89	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 Own customers are monitored and customer background details available/obtained Only renowned bank customers are accepted
90	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
91	What is the method used by the Entity?	--
91a	Manual	Yes
91b	Automated	Yes
91c	Combination of Automated and Manual	Yes (Information obtained from customer at the time of onboarding and data checked by using respective applications / information sources)

92	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
93	What is the method used by the Entity?	--
93a	Manual	No
93b	Automated	Yes
93c	Combination Automated and Manual	No
94	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	--
94a	Consolidated United Nations Security Council Sanctions List (UN)	Yes
94b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Yes
94c	European Union Consolidated List (EU)	Yes
94d	Other (specify)	World check – PEP List
95	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day or T+1 Additionally, monthly crosscheck of customer database by default
96	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:	--
96a	Customer Data	Same day or T+1 Additionally, monthly crosscheck of customer database by default
96b	Transactions	Same day or T+1

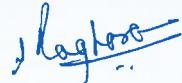

97	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	SBI Frankfurt is a branch of SBI Mumbai and SBI Frankfurt has no branches, subsidiaries, or representative offices
98	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
11. TRAINING & EDUCATION		
99	Does the Entity provide mandatory training, which includes:	--
99a	Identification and reporting of transactions to government authorities	Yes
99b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
99c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes (details part of the policy/instructions made available to all personnel)
99d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes, as far as business/products that are offered/performed by the branch are affected
99e	Conduct and Culture	Yes
100	Is the above mandatory training provided to:	--
100a	Board and Senior Committee Management	Yes
100b	1st Line of Defence	Yes
100c	2 nd Line of Defence	Yes

100d	3 rd Line of Defence	Yes, as far as the 3 rd line of defence is located inhouse Internal Audit Function outsourced to renowned (top 5) auditing firm as an additional measure for crosscheck of the AML/KYC/CTF and training standard at branch
100e	3rd parties to which specific FCC activities have been outsourced	Not applicable
100f	Non-employed workers (contractors/consultants)	No Contractors/consultants are only used by the Branch in exceptional cases. These are mainly employees of companies with which the branch has a contractual relationship (e.g. licensed software products or law firms). No Freelancers consulted by branch.
101	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
102	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes (obliged to join training/seminars etc. at minimum annual intervals)
103	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
12. QUALITY ASSURANCE /COMPLIANCE TESTING		
104	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
105	Does the Entity have a program wide risk-based Compliance Testing process (separate to the independent Audit function)?	Yes

106	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches
13. AUDIT		
107	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 Financial Crime, AML, CTF and Sanctions policies and practices on a regular basis?	Yes
108	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	--
108a	Internal Audit Department	Annually
108b	External Third Party	Approx. annually by Statutory Auditors Corporate Centre = approx. every 18 months
109	Does the internal audit function or other independent third party cover the following areas:	--
109a	AML, CTF & Sanctions policy and procedures	Yes
109b	KYC / CDD / EDD and underlying Methodologies	Yes
109c	Transaction Monitoring	Yes
109d	Transaction Screening including for sanctions	Yes
109e	Name Screening & List Management	Yes
109f	Training & Education	Yes
109g	Technology	
109h	Governance	Yes

109i	Reporting/Metrics & Management Information	Yes
109j	Suspicious Activity Filing	Yes
109k	Enterprise-wide Risk Assessment	Yes
110	Are adverse findings from internal and external audits followed up until closure?	Yes
111	Confirm that all responses provided in the above Section, AUDIT are representative of all the LE's branches	Details provided are applicable for: State Bank of India, Mainzer Landstraße 61, 60329 Frankfurt am Main, Germany State Bank of India Frankfurt has no branches

Yours faithfully,

Date	Name / Designation	Signature
14.06.2023	Mr. Raghavan Sriraman Chief Executive Officer (CEO)	
14.06.2023	Mr. Bernd Meist Joint Chief Executive Officer (JCEO) & Chief Compliance Officer	
14.06.2023	Mr. Kresimir Dominko CO & AML-Officer Contact: Email: k.dominko@statebank-frankfurt.com	