

AML/KYC/CFT Questionnaire - Wolfsberg format

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

| No. | Question | Answer |
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| 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 |

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| 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 Bhagwat Singh Rana (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 | | |
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| 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 |
| 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, (limited) |
| 21c | Trade Finance | Yes |
| 21d | Payable Through Accounts | No |

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| 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 |

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| 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 |

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| 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 |

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| 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 |

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| 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 |

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| 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. |

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| 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 |

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| 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 |

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| 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 | | |
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| 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 |

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| 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 |

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| 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 |

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| 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 Yes, 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. |

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| 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 |

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| 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) |

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| 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 | | |
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| 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. However, 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 | | |
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| 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 | 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 |

| 10. SANCTIONS | | |
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| 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 reputable 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 reputable 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) |

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| 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 check of customer database by default |
| 96b | Transactions | Same day or T+1 |

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| 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 |
|------------|--|--|
| 23.08.2024 | Mr. Bhagwat Singh Rana Chief Executive Officer (CEO) |  |
| 23.08.2024 | Mr. Bernd Meist Joint Chief Executive Officer (JCEO) & Chief Compliance Officer |  |
| 23.08.2024 | Mr. Kresimir Dominko CO & AML-Officer Contact: Email: k.dominko@statebank-frankfurt.com |  |

