



Financial Institution Name:

Nordea Bank Abp

Location (Country) :

Finland

| 1 | Full Legal name | Nordea Bank Abp |
|-------------|---|---|
| 2 | Append a list of foreign branches which are covered by this questionnaire (if applicable) | Nordea Danmark, filial af Nordea Bank Abp i Finland; Nordea Bank Abp, filial i Norge; Nordea Bank Abp, filial i Sverige |
| 3 | Full Legal (Registered) Address | Satamaradankatu 5, 00020 Nordea, Helsinki Finland |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation / establishment | 27.9.2017 |
| 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 OMX Stockholm, Helsinki and Copenhagen. For ticker symbols, please refer to: https://www.nordea.com/en/investor-relations/share/share-information/share-data/ |
| 6 b | Member Owned / Mutual | No |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | Yes |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | Sampo Plc https://www.nordea.com/en/investor-relations/share/shareholders/ |
| 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 | |

| 2. AML, CTF & SANCTIONS PROGRAMME | | |
|-----------------------------------|--|--|
| 9 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 9 a | Appointed Officer with sufficient experience / expertise | Yes |
| 9 b | Cash Reporting | Not Applicable |
| 9 c | CDD | Yes |
| 9 d | EDD | Yes |
| 9 e | Beneficial Ownership | Yes |
| 9 f | Independent Testing | Yes |
| 9 g | Periodic Review | Yes |
| 9 h | Policies and Procedures | Yes |
| 9 i | Risk Assessment | Yes |
| 9 j | Sanctions | Yes |
| 9 k | PEP Screening | Yes |
| 9 l | Adverse Information Screening | Yes |
| 9 m | Suspicious Activity Reporting | Yes |
| 9 n | Training and Education | Yes |
| 9 o | Transaction Monitoring | Yes |
| 10 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes |
| 11 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 11a | If Y, provide further details | Nordea Finance Companies (being part of Nordea Group) perform initial KYC in certain cases. Nordea Life Pension in Norway utilises predefined insurance company to sell low risk products where the SDD is conducted by the insurance company. |

| 3. ANTI BRIBERY & CORRUPTION | | |
|------------------------------|--|----------------|
| 12 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | Yes |
| 13 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| 14 | Does the Entity provide mandatory ABC training to: | |
| 14 a | Board and Senior Committee Management | Yes |
| 14 b | 1st Line of Defence | Yes |
| 14 c | 2nd Line of Defence | Yes |
| 14 d | 3rd Line of Defence | Yes |
| 14 e | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced | Not Applicable |
| 14 f | Non-employed workers as appropriate (contractors / consultants) | Yes |

| 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
|---|--|-----------------|
| 15 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 15 a | Money laundering | Yes |
| 15 b | Terrorist financing | Yes |
| 15 c | Sanctions violations | Yes |
| 16 | Does the Entity have policies and procedures that: | |
| 16 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 16 b | Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs | Yes |
| 16 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | No |
| 16 d | Prohibit accounts / relationships with shell banks | Yes |
| 16 e | Prohibit dealing with another Entity that provides services to shell banks | Yes |
| 16 f | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| 16 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 |
| 16 h | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |
| 16 i | Define escalation processes for financial crime risk issues | Yes |
| 16 j | Specify how potentially suspicious activity identified by employees is to be escalated and investigated | Yes |
| 16 k | Outline the processes regarding screening for sanctions, PEPs and negative media | Yes |
| 17 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 18 | Does the Entity have a record retention procedures that comply with applicable laws? | Yes |
| 18 a | If Y, what is the retention period? | 5 years or more |

| 5. KYC, CDD and EDD | | |
|---------------------|--|---|
| 19 | Does the Entity verify the identity of the customer? | Yes |
| 20 | 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 |
| 21 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 21 a | Ownership structure | Yes |
| 21 b | Customer identification | Yes |
| 21 c | Expected activity | Yes |
| 21 d | Nature of business / employment | Yes |
| 21 e | Product usage | Yes |
| 21 f | Purpose and nature of relationship | Yes |
| 21 g | Source of funds | Yes |
| 21 h | Source of wealth | Yes |
| 22 | Are each of the following identified: | |
| 22 a | Ultimate beneficial ownership | Yes |
| 22 a1 | Are ultimate beneficial owners verified? | Yes |
| 22 b | Authorised signatories (where applicable) | Yes |
| 22 c | Key controllers | Yes |
| 22 d | Other relevant parties | Other relevant Associated Parties on risk sensitive basis |
| 23 | Does the due diligence process result in customers receiving a risk classification? | Yes |
| 24 | 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 |
| 25 | 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 |
| 26 | Does the Entity have a process to review and update customer information based on: | |
| 26 a | KYC renewal | Yes |
| 26 b | Trigger event | Yes |

| | | |
|--------------|---|--|
| 27 | 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? | |
| 27 a | Non-account customers | EDD on a risk based approach |
| 27 b | Non-resident customers | EDD on a risk based approach |
| 27 c | Shell banks | Prohibited |
| 27 d | MVTS/ MSB customers | EDD & restricted on a risk based approach |
| 27 e | PEPs | EDD on a risk based approach |
| 27 f | PEP Related | EDD on a risk based approach |
| 27 g | PEP Close Associate | EDD on a risk based approach |
| 27 h | Correspondent Banks | EDD & restricted on a risk based approach |
| 27 h1 | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014? | Yes |
| 27 i | Arms, defense, military | EDD & restricted on a risk based approach |
| 27 j | Atomic power | EDD & restricted on a risk based approach |
| 27 k | Extractive industries | EDD & restricted on a risk based approach |
| 27 l | Precious metals and stones | EDD on a risk based approach |
| 27 m | Unregulated charities | EDD on a risk based approach |
| 27 n | Regulated charities | EDD on a risk based approach |
| 27 o | Red light business / Adult entertainment | EDD on a risk based approach |
| 27 p | Non-Government Organisations | EDD on a risk based approach |
| 27 q | Virtual currencies | EDD on a risk based approach |
| 27 r | Marijuana | EDD & restricted on a risk based approach |
| 27 s | Embassies / Consulates | EDD on a risk based approach |
| 27 t | Gambling | EDD & restricted on a risk based approach |
| 27 u | Payment Service Provider | EDD on a risk based approach |
| 27 v | Other (specify) | Prohibited: Customers that are legal entities and that have bearer shares within their ownership structure, and where such customers are not subject to acceptable controls. |
| 28 | If restricted, provide details of the restriction | There are internal policies restricting customer groups under 27 d,h,i,j,k,r,t: It should also be noted that customers producing marijuana legally for medical production are not prohibited. |

| 6. MONITORING & REPORTING | | |
|---------------------------|---|-------------------------------------|
| 29 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| 30 | What is the method used by the Entity to monitor transactions for suspicious activities? | Combination of automated and manual |
| 31 | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| 31 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? | Yes |
| 32 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |

| 7. PAYMENT TRANSPARENCY | | |
|-------------------------|---|---|
| 33 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |
| 34 | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: | |
| 34 a | FATF Recommendation 16 | Yes |
| 34 b | Local Regulations | Yes |
| 34 b1 | Specify the regulation | EU Regulation 2015/847 and the related EBA Joint Guidelines 22 September 2017 |
| 34 c | If N, explain | |

| 8. SANCTIONS | | |
|--------------|--|---|
| 35 | 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 |
| 36 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 37 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 37 a | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for filtering transactional data |
| 37 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 e | Lists maintained by other G7 member countries | Not used |
| 37 f | Other (specify) | In addition to global regulatory sanctions lists, screening is conducted against local regulatory lists where applicable. |
| 38 | 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? | No |

| 9. TRAINING & EDUCATION | | |
|-------------------------|---|-----|
| 39 | Does the Entity provide mandatory training, which includes : | |
| 39 a | Identification and reporting of transactions to government authorities | Yes |
| 39 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 39 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 39 d | New issues that occur in the market, e.g., significant regulatory actions or new regulations | Yes |
| 40 | Is the above mandatory training provided to : | |
| 40 a | Board and Senior Committee Management | Yes |
| 40 b | 1st Line of Defence | Yes |
| 40 c | 2nd Line of Defence | Yes |
| 40 d | 3rd Line of Defence | Yes |
| 40 e | 3rd parties to which specific FCC activities have been outsourced | Yes |
| 40 f | Non-employed workers (contractors / consultants) | Yes |

| 10. AUDIT | | |
|-----------|---|-----|
| 41 | 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 and Sanctions policies and practices on a regular basis? | Yes |

Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2020 (FCCQ V1.1)

Nordea Bank Abp

(Financial Institution name)

Morten Duelund

I, (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)