

Financial Institution Name: Location (Country) :

Sparebanken Møre			
Norway			

The questionnaire is required to be answered on a Logal Entity (LE) Level. The Financial institution should answer the questionnaire at the legal entity level including any branches for which the cilent base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	rent than its Entity Head Office, a separate questionnaire can be complete Question	Answer
1. ENTITY	/ & OWNERSHIP	The state of the first term of the state of
1	Full Legal Name	
	I di Legar Name	
		Sparebanken Møre
2	Append a list of foreign branches which are covered by	
	this questionnaire	
		The bank has no foreign branches
		
3	Full Legal (Registered) Address	Kipervikgata 6
		N-6003 Alesund
		Norway
4	Full Primary Business Address (if different from above)	
-7	and thinary business rudiess (if different from above)	
-		
5	Date of Entity incorporation/establishment	
		April 1st 1985
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	
	3,23.	Oslo Børs (Euronext Oslo Stock Exchange) - ticker MORG
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	
	bollolicial crivicia wall a riolaling of 70 % of more	
7	% of the Entity's total shares composed of bearer shares	
		0
	D 4 5 12 63 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	
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	
J		No
10	services only through online channels? Name of primary financial regulator/supervisory authority	
10	inancial regulator/supervisory authority	
		Finanstilsynet (The Financial Supervisory Authority of Norway)
		Transferred fine financial Supervisory Adminity of Holway)
11	Provide Legal Entity Identifier (LEI) if available	
• •		
		5967007LIEEXZX5PU0Q5
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	
	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
	· ·	Norway
14	Select the business areas applicable to the Entity	
2001/41		Yes
14 a 14 b	Retail Banking Private Banking	Yes

14.0		
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
		Distributor of insurance, mutual funds, leasing, credit cards from 3rd parties
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided).	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Less than \$10 million
17	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	Sparebanken Møre is a Norwegian Savings Bank under the Norwegian act on Financial Institutions and Financial Concerns (Finansforetaksloven). The bank i partly owned by depositors and partly by holders of Equity Certificates.
	to the answers in this section.	Financial Concerns (Finansforetaksloven). The bank i partly owned by depositors and partly by holders of Equity
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2. PRODU 19 19 a 19 a1	Icts & Services Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Financial Concerns (Finansforetaksloven). The bank i partly owned by depositors and partly by holders of Equity Certificates.
2. PRODE 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. JCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	Financial Concerns (Finansforetaksloven). The bank i partly owned by depositors and partly by holders of Equity Certificates.
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19 a1i		
	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
10 h	Cross-Border Bulk Cash Delivery	No No
19 b		Yes
19 c	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No
	oner time party payment services to their customers.	INO .
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
13 13	Other Frease explain	
19 j	Private Banking	Domestic
19 k		No
		No.
19		
19 m		No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No.
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence;	11 (1847) 18 18 18 18 18 18 18 18 18 18 18 18 18
19 p1		No
19 p1a	If yes, state the applicable level of due diligence	
	Wire transfers	No
19 p2		
19 p2a	If yes, state the applicable level of due diligence	
19 p3		No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including	
	describing the level of due diligence.	
	describing the level of due diligence.	
19 a		
19 q	Other high-risk products and services identified by the	
19 q		
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20 20 a 21	Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Cash Deposit Machine for our own customers Yes
20 a 20 a 21 3. AML, CT	Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Cash Deposit Machine for our own customers Yes
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20 a 21 3. AML, CT 22 22 a 22 b	Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Cash Deposit Machine for our own customers Yes 19 n) Operated by DNB ASA, Norway Yes Yes
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22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	11-100
_	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in Question 29.	
25	Does the Board receive, assess, and challenge regular	
20	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	Yes
	components of its AML, CTF & Sanctions programme?	165
26 a	If Y, provide further details	The Norwegian Postal service performs identity check of customers. Passports/Identity cards are scanned and
		a copy of scanned documents are sent to the bank. The quality of scanned documents is checcked by the
		bank.
		This applies to remote customers that do not have access to any of our branches.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	res
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	00 d) No annulated requirement to report narmal each transactions and available transactions
		22 d) No regulatory requirement to report normal cash transactions, only suspicious transactions
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
-	consistent with applicable ABC regulations and	Von
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers	V
	with sufficient experience/expertise responsible for	Yes
22	coordinating the ABC programme? Does the Entity have adequate staff with appropriate	
33	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Not Applicable
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
25 F	advantage Includes enhanced requirements regarding	
35 b	includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books	
50 0	and records (this may be within the ABC policy or any	
	other policy applicable to the Legal Entity)?	Yes
00	Danish Fath have posted in the season to the	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	
31	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
30	(EWRA) been completed in the last 12 months?	Yes
	(2.77 V) boot completed in the last 12 months:	100
20 -	If N, provide the date when the last ABC EWRA was	
38 a	completed.	
	completed.	
39	Does the Entity have an ABC residual risk rating that is	Von
	the net result of the controls effectiveness and the	Yes
40	inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk	
40	components detailed below:	
40 a	Potential liability created by intermediaries and other	V
-10 u	third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly	No
	or through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
40.1	public officials	
40 d	Corruption risks associated with gifts and hospitality,	Yes
	hiring/intemships, charitable donations and political contributions	169
	L commonoris	

40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other	L
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	No
42 e	Third parties to which specific compliance activities	
72.0	subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate	No
10	(contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to	No
	specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context	
	to the answers in this section.	40 Risk assessment for this area is covered by the AML risk assessment and also by a separate Operational
		risk assessment.
		lisk assessment.
	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	[2] () : (MEC) (() 보고 있는 보고 프로젝트 (() : ()
	detect and report:	않는 그는 사용 중 동안을 보면 하는 것이 없다면 하고 있다. 나는 사용 유민들은 살이 있는 그들은 사람들은 것을 했다.
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
41	annually?	Yes
48	Has the Entity chosen to compare its policies and	엄크로 20 1.6.6. [2.5.4] 하면 하는 경향 2.5 1.6. (1.6.) 이 1.5
	procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
	EU Standards	Yes
48 b		
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for	
40 D	unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide	
49 C		Yes
	banking services to unlicensed banks	L V
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	Yes
	services to shell banks	1
49 f	Prohibit opening and keeping of accounts for Section	Yes
	311 designated entities	169
49 g	Prohibit opening and keeping of accounts for any of	
- 3	unlicensed/unregulated remittance agents,	l
	exchanges houses, casa de cambio, bureaux de	Yes
	change or money transfer agents	
40.1		
49 h	Assess the risks of relationships with domestic and	
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Yes
49 h	Assess the risks of relationships with domestic and	Yes

comply with applicable lews? If Y, what is the retention period? Syears or more 5 confirm that all responses provided in the above Section are representative of all the LE's branches 5 a lifty, charly which juestions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. So and the branch/es that this applies to. 6. AML, CTE & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTE EWRA cover the inherent risk components detailed below: Yes 4 a Client Yes 4 b Product Yes 4 c Geography 5 c Per Identification 5 c Jose the Entity's AML & CTE EWRA cover the controls effectiveness components detailed below: 5 a Transaction Monitoring Yes 5 b Customer Due Diligence Yes 5 c Per Identification Yes 5 c Per Identification Yes 5 c News 5 c News 5 c Per Identification Yes 5 c News 5 c New		Wolfsberg Group C	
### Additional Content and Process of the Process o	49 i	Define the process for escalating financial crime risk	
### Special Sections of the process of the state of the s			Yes
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49 m Cultimo the processes regarding screening for sanctions, PEPP and divorse Model and Adverse Model			
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58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	56 a 57 a 57 b 57 c 57 d	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed, Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes Yes Yes Yes Yes Yes Yes Yes
58 b Governance Yes 58 c List Management Yes	56 56 a 57	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes Yes Yes Yes Yes Yes Yes Yes Yes
58 c List Management Yes	56 a 57 a 57 b 57 c 57 d 58	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed, Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
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58 d Management Information Yes	56 56 a 57 57 a 57 b 57 c 57 d 58 58 a 58 b	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Yes Yes Yes Yes Yes Yes Yes
	56 56 a 57 57 a 57 b 57 c 57 d 58 58 a 58 b 58 c	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes Yes Yes Yes Yes Yes Yes Yes

E9 a	Name Screening	Yes
58 e		Yes
58 f	Transaction Screening	
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
-	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	55e) N.S is manual and based on trigger events such as suspicious transactions/EDD/loan applications. Searci
	to the answers in this section,	in adverse media database to check for both negative news/changes in ownership/management. And
		connection with financing applications. 57+58 Sanctions risk assessment is part of the AML/CTF risk
		assessment
7. KYC,	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
	Ownership structure	Yes
64 d		
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
	Other relevant parties	Yes
65 d		165
66	What is the Entity's minimum (lowest) threshold applied	25 %
	to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the	[자식물의 선물과 발달 [25] 공기 사이트로 있었다. [270] (2012년 1월 2012년 1월 2
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
0, 40	Carior (openiny)	
		Reports of suspicious transactions to Norwegian Financial Crime Authority (FIU) (Økokrim)
68	For high risk non-individual customers, is a site visit a	Vac
	part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	No
68 a2	KYC renewal	No
68 a3	Trigger event	No
		Yes
68 a4	Other	169
68 a4a	If yes, please specify "Other"	
		As a part of EDD
		As a part of EDD,
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
09 a		
69 a1	Onboarding	Yes
	Onboarding KYC renewal	Yes No

		orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1,4
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening	
• •	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	res
71 a	If Y, is this at:	Yes
71 a1 71 a2	Onboarding KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	
		Combination of automated and manual
73	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	
	from screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	
	rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3 74 a4	3 – 4 years 5 years or more	Yes No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	, , , , , ,	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
70		E DEPENDANCE PROPERTY AND AND ADDRESS OF THE PROPERTY OF THE P
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or	보는 경우가 많은 가는 가는 사람이 나를 내용하는데 그렇게 있는 것이 살아보고 있습니다. 그는 사람이 없는데 없는데 없는데 없다면 다른데 없다.
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment	DO NOT THE OUT OF THE OUT OUT OF THE OUT OF THE OUT OF
	contain the elements as set out in the Wolfsberg	
-	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d 76 e	Extractive industries Gambling customers	EDD on risk-based approach Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power Payment Service Providers	Prohibited EDD on risk-based approach
76 m	PEPs Providers	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks Travel and Tour Companies	Prohibited EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	EDD on risk-based approach
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Yes

70	If V is discount in the second of the second in	Carias business management
78 a 79	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding	Senior business management
19	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	78 + 80 EDD Quality control and approval performed by AML-officer for all new customers.
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	All transactions are monitored automated. In addition, we use manual monitoring and extracts of data in connection with EDD. We also initiate investigations with spesific themes.
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	TietoEvry.
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to	
93 a	ensure compliance with: FATF Recommendation 16	Yes
	Local Regulations	Yes
93 b	If Y, specify the regulation	res
93 b1	ii 7, specily the regulation	"Lov om tiltak mot hvitvasking og terrorfinansiering" (translates to "Act on measures against money laundering and terrorist financing"). Implemented Oct. 15th 2018.
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	165
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
IO CANO	TIONS	
10. SANC		
98	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
99	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
100	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
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual'	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	TietoEvry and SWIFT transaction screening.
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	Other
103	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
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	Lload for personing auctomore and hanaficial owners and for filtering transcational data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
106 c	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	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
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	102 a2) Assurance report from SWIFT
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d		No
112 e	Third parties to which specific ECC activities have	Not Applicable
112 f		Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a		Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible for Ves	Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4				
and the branchies that this applies to. Fappropriate, provide any additional information/context to the answers in this section. Fappropriate, provide any additional information/context to the answers in this section. Fappropriate, the first have a surgian wide risk based Quality Assurance programme for francial crims (separate from the provide provide and the provide francial country). Fappropriate Audit studies. Compliance Tearing process (separate from the undergoarded Audit studies). Confirm that all responses provided in the above Section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of this section. Fappropriate, provide any additional information/context to the answers of the fappropriate and practice on an engager a			If N, clarify which questions the difference/s relate to	115 a	
If appropriate, provide any additional information/context to the answers in this section.					
to the answers in this section. 12. CRUALITY ASSURANCE (COMPLIANCE TESTING					
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129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering,
Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

SPAREBANKEN MORE (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

YTRELID (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

(Signature & Date) 22/5-25

(Signature & Date) 22.05.25