

Hamburger Sparkasse AG

OUR ANTI-MONEY LAUNDERING POLICY

1. Guidelines

Hamburger Sparkasse AG has a written ANTI-MONEY LAUNDERING POLICY which applies to all our offices and branches. This AML-Policy is based on the following guidelines and laws edited by the relating authorities like FATF, European-Union (EU) and Germany's national authorities:

- Guidelines issued by the FATF (Germany is a FATF member country)
- Relating directives of the Council of the European Communities on the prevention of the use of the financial system for the purpose of money laundering in its latest versions
- The "German Money Laundering Act (Geldwäschegesetz)" in its latest version
- Relevant guidelines issued by the Federal Banking Supervisory Office ("Bundesanstalt für Finanzdienstleistungsaufsicht") as banking supervision authority in Germany

Hamburger Sparkasse AG's ANTI-MONEY LAUNDERING POLICY complies with above mentioned guidelines, directives and laws.

2. Fundamentals

- Our full legal name is Hamburger Sparkasse AG.
- Our registered physical address is: Ecke Adolphsplatz / Grosser Burstah, 20457 Hamburg, Germany.
- Our supervisory regulatory authorities are both "European Central Bank (ECB)" and "Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)".
- Our banking licence is issued by afore mentioned authority with the number BA 31 (118959) 100.
- Our main type of business is retail banking.
- Hamburger Sparkasse AG is 100% owned by HASPA Finanzholding, Hamburg, Germany.
- We do not maintain any foreign branches or subsidiaries.
- We also do not transact any business with shell banks or banks operating under an offshore banking licence.
- We are not allowed to offer any anonymous accounts.
- We do not allow nested accounts.
- We do not allow any downstream correspondent banking.
- There are no PEPs among our shareholders or members of our Board of Directors.
- The name of our FIU is: Financial Intelligence Unit, Generalzolldirektion, Postfach 85 05 55, 51030 Köln, Germany

- The names of our senior management are:
 - Dr. Harald Vogelsang, Speaker
 - Frank Brockmann, Deputy Speaker
 - Axel Kodlin, Managing Director
 - Jürgen Marquardt, Managing Director
 - Dr. Olaf Oesterhelweg, Managing Director

- Name and contact details of our AML-officer:
 - Mr. Christian Albers
 - Phone and fax: +49-40-3579-7111/-4546
 - E-mail: christian.albers@haspa.de

3. Details

Our ANTI-MONEY LAUNDERING policies and procedures identify the true identity of customer and beneficial owner of funds and transactions. We have employed a customer identification program that is designed to obtain and verify information regarding our customers' true identity, source of wealth, economic activity and the nature of anticipated transactional activity. Suspicious transactions will be reported to the relating authorities based on our monitoring system that is designed to facilitate the identification of suspicious transactional activity. We provide anti-money laundering training on a periodic basis to our staff which educates our employees in the ways of preventing money laundering transactions and assists them in identifying suspicious activities. Audit and compliance review functions test the adequacy of our anti-money laundering procedures and policies.