## the Wolfsberg Group

Financial Institution Name: Location (Country) : Eurizon Asset Management Slovakia, správ. spol., a.s. Mlynské nivy 1, 820 04 Bratislava, Slovakia

I. ENTTY & OWNERSHIP         Eutron Asset Management Storekia, språv. spol, a.s.           Append a list of foreign branches which are covered by this questionarie (if applicable).         NA           I. Full Legal Angen         Eutron Asset Management Storekia, språv. spol, a.s.           I. Full Legal Angen         Append a list of foreign branches which are covered by this questionarie (if applicable).           I. Full Legal Angent Address (I different from above)         NA           I. Full Legal Angent Address (I different from above)         NA           I. Publick Traded (I different from above)         No           I. Publick Traded (I different from above)         No           I. Publick Traded (I different from above)         No           I. M. Y. provide to than about and I different or utimate beneficial owners with a holding of 10% or more No         No           I. M. Y. provide to than above or provide aservices only through online charmels?         No           J. Dess the Bank have a programme that sets minimum AML CTF and Sanctions standards regarding the following components:         No           J. Dess the Entity Nave a programme that sets minimum AML CTF and Sanctions standards regarding the following components:         Yes	No #	Question	Answer
Full Legal name         Eutron Asset Maragement Slovakia, språv. spol., n.s.           2         Append a list of forginizable)         NA           3         Full Legal (Registered) Address         NA           0         Date of Entity incorporationstatisablement         17.4.200           3         Soliect type of ownership and append an ownership chari if available         NA           3         Soliect type of ownership and append an ownership chari if available         NA           3         Bet of the Entity ownership and append an ownership chari if available         NA           3         Bet of the Entity ownership and append an ownership chari if available         No           3         Bet ownership and append an ownership chari if available         No           4         Privately Owner         No           5         Government or State Owner by 25% or more         No           6         Privately cloat shares composed of basers shares         0%           7         % of the Entity or any othe branches owner by 16% or more         No           8         Off type off the America owner by 16% or more         No           9         Des the Entity wave a programme that sets minimum AML, CTF and Sanctions standards regarding the following composets         No           10         Doese the Entity have a programme that sets minimum AML	-		
2         Append a list of foreign branches which are covered by this questionale (f applicable)         NiA           3         Full Legal (Registered) Address         Mynake nivy 1, 520 04 Bratislave, Slovakia           5         Date of Entity incorporation/setable/ment for above)         NiA           6         Date of Entity incorporation/setable/ment for above)         NiA           7         Accose         NiA           6         Get of Entity incorporation/setable/ment for and tacker symbol         NiA           7         Accose         No           8         Get of a stress builds of an enholders or utilimate         No           9         Overnment or State Owned W 25% or more         No           9         Get entity for address with a holding of 10% or more         No           9         Order Entity Statel states composed of basers harders         0%           9         Order Entity Statel states composed of basers harders         No           9         Does the Bank have a Virtual Bank License or provide services only movide more more many services and services only movide more many services and services	1		Eurizon Asset Management Slovakia, správ, spol. a s
guestionnaire (if applicable)         NA           Full Legal (Registered) Address         Mynake rivy 1, 200 04 Brasilanva, Slovakia           Date of Entity incorporation/stabilishment         17.4.200           Select type of ownership and append an ownership chari (i available         NA           a         Publicly Traded (25% of shares publicly traded)         No           a         Publicly Traded (25% of shares publicly traded)         No           a         Publicly Traded (25% of shares publicly traded)         No           b         Member Owned/Mutual         No           c         Government or State Owned by 25% or more         No           c         Government or State Owned by 25% or more         No           c         Government or State Owned by 25% or more         No           c         Government or State Assoc composed O bearer share         0%           c         Government or State Owned by 25% or more         No           c         Yor Wide the name of the relevant branches which coparate under an OX         No           c         Does the Entity, norary of its branches, operate under an OX         No           c         The Assoc Composed CBL ?         No           c         Caste the Entity function (ELL) if available         soperate           z         A	2		
Full Legal (Registered) Address         Mymake nivy 1, 820 04 Braisbaw, Slovakia           Full Legal (Registered) Address         NA           Select of Entity incorporation/establishment         17, 4200           Select type of ownership and append an ownership chari if available         17, 4200           Publicly Traded (25% of shares publicly traded)         No           Select type of ownership and append an ownership chari if available         No           Select type of ownership and append an ownership chari if available         No           Select type of ownership and append an ownership chari if available         No           Select type of ownership and append and ownership chari is an owner ownership charing         No           Select type of ownership and type of type	-		N/A
Full Primary Business Address (if different from above)         NA           Dete of Entity incorporation/setablishment         17 A 2000           Select type of ownership and append an ownership chari if available         TA 2000           Ball         Publicly Traded (25% of shares publicly traded)         No           Ball         If V, indicate the exchange traded on and ticker symbol         No           Ball         Member Owned/Mutual         No           Ball         Firvitably Owned         Yes           Ball         Does the Entity to any of its branches, operate undra nold         No           Ball         Owned Hirvitably Owned Profester Mirb         Owned           Ball         Ownership         No           Ball         Charbon Streaming         No           Ball         Appointed Officer with sufficiant experiance/experian         No	3		Mlvnské nivy 1. 820 04 Bratislava. Slovakia
Select type of ownership and append an ownership chart if available         No           Publicly Traded (25% of shares publicly traded)         No           If IY, Indicate the exchange traded on and tacker symbol         No           Image: Select Se	4		
Select type of ownership and append an ownership chart if available         No           Publicly Traded (25% of shares publicly traded)         No           If IY, Indicate the exchange traded on and tacker symbol         No           Image: Select Se	5	Date of Entity incorporation/establishment	17.4.2000
available         Publicly Traded (25% of shares publicly traded)         No           att         If Y, indicate the exchange traded on and ticker symbol         No           att         If Y, indicate the exchange traded on and ticker symbol         No           att         If Y, indicate the exchange traded on and ticker symbol         No           att         Fit Y, indicate the exchange traded on and ticker symbol         No           att         If Y, provide transmother by 25% or more         No           att         If Y, provide transmother by 25% or more         No           att         If Y, provide transmother by 25% or more         Presse see the documentation provided separately.           att         May or life branches, operate under an OBL         Presse see the documentation provided separately.           att         Ty provide the mame of the relevant branchies which operate under an OBL         No           appointed Offerent CLEI If available         Attempointed Offerent CLEI If available         Attempointed Offerent CLEI If available           attempointed Offerent CLEI If available         Attempointed Offerent CLEI If available         Attempointed Offerent CLEI If available           attempointed Offerent Standards regaring the following         Yes         If CLEI Adverse Information Screening           attempointed Offerent Standards regaring the following         Yes         If C	6		
a1         If Y, indicate the exchange traded on and licker symbol           b         Member Owner/Whiteial         No           c         Government of State Owned by 25% or more         No           c         Firvitately Owned         Yes           c         Firvitately Owned         Yes           d         Firvitately Owned         Yes           d         Otes the Entity, or any of its branches, operate under an Offshore Banking License (DBL) ?         No           d         Offshore Bank have a Virtual Bank License or provide services only through online channels?         No           d         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           d         Provide Legal Entity Identifier (LE) revailable         1975-19           2. AML, CTF & SANCTONS PROGRAMME         Yes         10           10         Boes the Entity have a programme that sets minimum AML, CTF & SANCTONS PROGRAMME         Yes           11         Does the Entity in the sufficient experience/expertise         Yes           11         Adverse Information Ecreming         Yes           12         Bendicial Ownership         Yes           13         Adverse Information Ecreming         Yes           14         Clobices and Procedures         Yes			
Image:         Mon           is         Government of State Owned by 25% or more         No           id         Privately Owned         Yes           id         If 'Y, provide details of shareholders or ultimate         Please see the documentation provided separately.           id         If 'Y, provide the many of its branches, operate under an Ork         No           id         If 'Y, provide the many of its branches, operate under an Ork         No           id         If 'Y, provide the many of the relevant branch/es which operate under an Ork         No           id         Does the Earth wave a Virtual Bank License or provide services only through online channels?         No           id         Does the Entity have a virtual Bank License or provide services only through online channels?         No           id         Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:         No           id         Adverse Information Screening         Yes           id         Cash Reporting         Yes           id         Cost Portion Review         Yes           if         Does the Entity have a virtual Bank License or provide service         Yes           id         Cash Reporting         Yes           id         Does the Entity thave a programme that sets minimum AML, CTF an	6 a	Publicly Traded (25% of shares publicly traded)	No
Sc         Government of State Owned by 25% or more         No           04         Privately Owned         Yes           04         If Y, provide details of shareholders or utimate beneficial owners with a holding of 10% or more         Please see the documentation provided separately.           7         % of the Entity or any of its branches, operate under an Offshore Barking Lorense (OBL) ?         No           7         % of the Entity, or any of its branches, operate under an Offshore Barking Lorense (OBL) ?         No           7         8 at the State State Owner of Dearer shares Offshore Barking Lorense (OBL) ?         No           9         Does the Entity, or any of its branches, operate under an Offshore Barking Lorense (OBL) ?         No           9         Does the Entity, or any of its branches, operate under an Offshore NB State State Owner of Deares of provide services only through online channels?         No           10         Dees the Entity have a programme that sets minimum AML CFT and Sanctions Standards regarding the following components:         No           11         Appointed Officer with sufficient experience/experise ?         Yes           11         Adverse Information Screening         Yes           12         Bardenical Ownership         Yes           13         Appointed Officer with sufficient experience/experise ?         Yes           14         Policolis and Procedures ?	6 a1	If Y, indicate the exchange traded on and ticker symbol	
id     Privately Owned     Yes       6 d1     IV, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more Offshore Barking Lonese (OBL) ?     Prease see the documentation provided separately.       7     % of the Entity stora any of its branches, operate under an Offshore Barking Lonese (OBL) ?     No       8     IF Y, provide the name of the relevant branch/es which operate under an OBL     No       9     Does the Entity to comes (OBL) ?     No       10     Provide Legal Entity Identifier (LE) if available     3.1278-19       2. AML, CTF & SANCTIONS PROGRAMME     No       2. AML, CTF & Sanctions standards regarding the following components:     Yes       11     Does the Entity have a programme that sets minimum AML CTF and Sanctions standards regarding the following     Yes       12     Adverse Information Screening     Yes       13     Appointed Officer with sufficient experience/expertise     Yes       14     Cash Reporting     Yes       15     Adverse Information Screening     Yes       16     Boneficial Ownership     Yes       11     Policies and Procedures     Yes	6 b	Member Owned/Mutual	No
61         If Y, provide details of shareholders or ullimate beneficial owners with a holding of 10% or more         Please see the documentation provided separately.           7         % of the Entity's total shares composed of bearer shares         0%           8         Does the Entity, or any of the branches, operate under an Offshore Banking License (OBL) ?         No           9         If Y, provide the name of the relevant branch/es which operate under an OBL         No           9         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           10         Fronde Legal Entity Identifier (LEI) if available services only through online channels?         No           11         Does the Entity have a programme that sets minimum AML CTF and Sanctions standards regarding the following components:         Yes           11         Does the Entity have a programme that sets minimum AML CTF and Sanctions standards regarding the following components:         Yes           11         Adverse Information Screening         Yes           11         Adverse Information Screening         Yes           11         Peloide Review	6 C	Government or State Owned by 25% or more	No
beneficial owners with a holding of 10% or more         Please see the documentation provided separately.           9         Of the Entity to tal shares composed to bears takes         No           9         Does the Entity, or any of its branches, operate under an Offshore Banking License (DBL) ?         No           9         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           0         Provide Legal Entity Identity (LEI) of available services on provide legal Entity Identity (LEI) of available services on provide legal Entity Identity (LEI) of available services on provide legal Entity Identity (LEI) of available services on provide s	6 d		Yes
bit indication of the Entry's or any of its branches, operate under an Offshore Banking Locense (OBL)?         No           30         Does the Entry, or any of its branches, operate under an Offshore Banking Locense (OBL)?         No           31         If Y, provide the name of the relevant branch/es which operate under an OBL         No           30         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           31         Operate under an OBL         No           32         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           33         Operation of the relevant branch/es which operate under an OBL         No           34         CFF & SANCTIONS PROGRAMME         No           35         The Adverse Information Screening         Yes           34         Appointed Officer with sufficient experience/experise         Yes           35         Lidependent Testing         Yes           36         Independent Testing         Yes           37         Yes         Yes           37         Lidependent Testing         Yes           38         Independent Testing         Yes           39         Independent Testing         Yes           311         Policies and Procedures         Yes	6 d1	If Y, provide details of shareholders or ultimate	Please see the documentation provided congretely
Boos the Entity, or any of its branches, operate under an Offshore Banking Licenses (OEL) ?         No           3 a         If Y, provide the name of the relevant branch/es which operate under an OBL         No           9         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           0         Provide Legal Entity Identifior (LED) if available services only through online channels?         No           10         Does the Entity have a programme that sets minimum AML. CTF and Sanctions standards regarding the following components:         Yes           11 a         Appointed Officer with sufficient experience/expertise         Yes           12 b         Adverse Information Screening         Yes           13 c         CDD         Yes           14 c         CDD         Yes           15 c         Adverse Information Screening         Yes           16 c         CDD         Yes           17 d         Cost Reporting         Yes           18 d         Rick Assessment         Yes           19 L         Independent Testing         Yes           11 Policies and Procedures         Yes           11 Policies and Procedures         Yes           11 Subjicious Activity Reporting         Yes           12 Subclicous Activity Reporting		v	riease see the documentation provided separately.
Offshore Banking License (OBL) ?         No           3a         If Y, provide the mane of the relevant branch/es which operate under an OBL.         No           9         Does the Bank have a Virtual Bank License or provide services only through online channels?         No           10         Provide Legal Entity Identifier (LE) if available         1:107E+10           2.MLC CT & SANCTIONS PROGRAMME         Iter the Components:         1:107E+10           11         Appointed Officer with sufficient experience/expertise         Yes           12         Appointed Officer with sufficient experience/expertise         Yes           13         Appointed Officer with sufficient experience/expertise         Yes           14         Cash Reporting         Yes           15         Adverse Information Screening         Yes           14         Cash Reporting         Yes           15         Does the Entity heave a programme that sets minimum AML, CDB and Procedures         Yes           16         CDD         Yes           17         Beneficial Ownership         Yes           18         Reference         Yes           19         Procedures         Yes           11         Periodic Review         Yes           12         Precodic Review         Yes	7		0%
Offshore Banking Leense (OBL) *           3a         If Y, provide the name of the relevant branch/vs which operate under an OBL           9         Does the Bank have a Virtual Bank License or provide services only through online channels?           0         Provide Legal Entity Identifier (LE) if available           1         Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following componentis:           1         Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following componentis:           1         Appointed Officer with sufficient experience/expertise         Yes           1         Adverse Information Screening         Yes           1         CBD         Yes           1         Deficier with sufficient experience/expertise         Yes           1         EDD         Yes           1         EDD         Yes           1         Periodic Review         Yes           1         Sanctions         Yes           1         Sanctions         Yes	8		No
operate under an OBL         No           a Does the Bank have a Virtual Bank License or provide services only through online channels?         No           10         Provide Legal Entity Identifier (LE) if available         2:57E-10           2.MUL, CTF & SANCTIONS PROGRAMME         3:57E-10           11         Does the Entity have a programme that sets minimum AML CTF and Sanctions standards regarding the following components:         Yes           11         Appointed Officer with sufficient experience/expertise         Yes           12         Beneficial Ownership         Yes           13         Adverse Information Screening         Yes           14         Cash Reporting         Yes           15         Adverse Information Screening         Yes           16         Cash Reporting         Yes           17         EDD         Yes           18         Independent Testing         Yes           19         Independent Testing         Yes           11         Periodice Review         Yes           11         Periodica Advectivity Reporting         Yes           11         Sanctions Monitoring         Yes           12         Is the Entity Adv. CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Commitee?         Yes			
Does the Bank have a Virtual Bank License or provide services only through online channels?         No           10         Provide Legal Entity Identifier (LEI) if available 2. AML, CTF & SANCTIONS PROGRAMME         3107E+19           2. AML, CTF & SANCTIONS PROGRAMME         5107E+19           11         Does the Entity Identifier (LEI) if available components:         3107E+19           2. AML, CTF & SANCTIONS PROGRAMME         Vestore           11 a         Adverse Information Screening         Vestore           12 c         Beneficial Ownership         Yes           13 d         Cob         Yes           14 d         Cash Reporting         Yes           15 d         Indegendent Testing         Yes           16 d         Dob         Yes           17 d         Policies and Procedures         Yes           18 d         CDD         Yes           19 d         Indegendent Testing         Yes           11 Pelicies and Procedures         Yes           11 Policies and Procedures         Yes           13 PEP Screening         Yes           14 n         Training and Education         Yes           15 n         Transaction Monitoring         Yes           16 n         Training and Education         Yes	8 a		
services only through online channels?         No           0         Provide Legal Entity Identifier (LE) if available         5x87±10           2. AML, CTF & SANCTIONS PROGRAMME         Sance (LE) if available         5x87±10           2. AML, CTF & SANCTIONS PROGRAMME         Entity have a programme that sets minimum AML, CTF & and Sanctions standards regarding the following components:         Yes           11         Appointed Officer with sufficient experience/expertise         Yes           12         Adverse Information Screening         Yes           13         Appointed Officer with sufficient experience/expertise         Yes           14         Cash Reporting         Yes           15         EDD         Yes           16         Cash Reporting         Yes           17         Periodic Review         Yes           18         Risk Assessment         Yes           19         Independent Testing         Yes           11         Periodic Review         Yes           11         Policies and Procedures         Yes           11         Satcitons         Yes           11         Satcitons         Yes           11         Satcitons policy approved at least annually by the Board or equivalent Senior Management Committee?         Yes <td></td> <td></td> <td></td>			
10       Provide Legal Entity Identifier (LE) if available       5157E+19         2. AML, CTF & SANCTIONS PROGRAMME       5157E+19         11       Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:       11         11 a       Appointed Officer with sufficient experience/expertise       Yes         11 c       Beneficial Ownership       Yes         11 d       Cash Reporting       Yes         11 d       Cobe the Entity horenship       Yes         11 d       Cobe Appointed Officer with sufficient experience/expertise       Yes         11 d       Cash Reporting       Yes         11 d       Cash Reporting       Yes         11 f       EDD       Yes         11 h       Periodic Review       Yes         11 h       Periodic Review       Yes         11 h       Periodic Review       Yes         11 h       Sanctions       Yes         11 h       Sanctions       Yes         11 h       Sanctions       Yes         12 h       Periodic Review       Yes         13 h       Trainag and Education       Yes         14 n       Trainasciton Monitoring       Yes         13 o	9		No
2. AML, CTF & SANCTIONS PROGRAMME         11       Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:         12       A popointed Officer with sufficient experience/expertise       Yes         13       Appointed Officer with sufficient experience/expertise       Yes         14       Appointed Officer with sufficient experience/expertise       Yes         15       Beneficial Ownership       Yes         16       Cash Reporting       Yes         17       Priodic Review       Yes         18       Risk Assessment       Yes         19       Independent Testing       Yes         11       Policies and Procedures       Yes         12       PEF Screening       Yes         13       Aperical Evolution       Yes         14       Risk Assessment       Yes         15       Mask Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         13       Does the Entity Author parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13       Does the Entity coummeted policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes			
1       Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:         11 a       Appointed Officer with sufficient experience/expertise       Yes         11 b       Adverse Information Screening       Yes         11 c       Beneficial Ownership       Yes         11 c       Cash Reporting       Yes         11 d       Cash Reporting       Yes         11 d       Cash Reporting       Yes         11 d       Desender Testing       Yes         11 d       Periodic Review       Yes         11 d       Policies and Procedures       Yes         11 d       Stanctions       Yes         11 d       Suspicious Activity Reporting       Yes         11 d       Trainang and Education       Yes         11 d       Trainang and Education       Yes         12 e       Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior       Yes         13 d       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (heremater "mesa Sanpaolo Group").         13 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s.	10		3,157E+19
CTF and Sanctions standards regarding the following components: <ul> <li>Appointed Officer with sufficient experience/expertise</li> <li>Yes</li> <li>Adverse Information Screening</li> <li>Emericial Ownership</li> <li>Yes</li> <li>Cash Reporting</li> <li>Yes</li> <li>CDD</li> <li>Yes</li> <li>CDD</li> <li>Yes</li> <li>If E DD</li> <li>Yes</li> <li>If E DD</li> <li>Yes</li> <li>Periodic Review</li> <li>Yes</li> <li>Sanctions</li> <li>Yes</li> <li>Sanctions</li> <li>Yes</li> <li>Sanction Stuty Reporting</li> <li>Yes</li> <li>Sanction Monitoring</li> <li>Yes</li> <li>Training and Education</li> <li>Yes</li> <li>Training and Education</li> <li>Yes</li> <li>Training and Education for yeus</li> <li>Yes</li> <li>Sanctions for yout any components of its AML, CTF &amp; Sanctions programme?</li> <li>Yes</li> <li>Does the Entity barties to carry out any components of its AML, CTF &amp; Sanctions programme?</li> <li>Sanctisten with applicable ABC regulations and requirements to reasonably prevent, detect and report</li> <li>The Sampalob ABC regulations and requirements to reasonably prevent, detect and report</li> <li>Does the Entity sittemal audit function or other independent third parties dor carry could be procedures?</li> <li>The Board and Senior Committee Management</li></ul>			
components:     Yes       11 a     Appointed Officer with sufficient experience/experise     Yes       11 b     Adverse Information Screening     Yes       11 c     Beneficial Ownership     Yes       11 d     Cash Reporting     Yes       11 d     Cash Reporting     Yes       11 d     Cash Reporting     Yes       11 d     Independent Testing     Yes       11 d     Independent Testing     Yes       11 d     Periodic Review     Yes       11 d     Periodic Review     Yes       11 d     Policies and Procedures     Yes       11 d     Risk Assessment     Yes       11 m     Suspicious Activity Reporting     Yes       11 m     Suspicious Activity Reporting     Yes       11 m     Transaction Monitoring     Yes       12 e     Is the Entity SAML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior     Yes       13 a     Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?     Yes       13 a     If Y, provide further details     COD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "INB Bark"), part of the same group led by Intersa Sanpaolo S.p.A. (hereinafter "INB Bark"), part of the same group led by Intersa Sanpaolo S.p.A. (hereinafter "Inte	11		
1 a     Appointed Officer with sufficient experience/expertise     Yes       1 b     Adverse Information Screening     Yes       1 c     Bendficial Ownership     Yes       1 d     Cash Reporting     Yes       1 d     Cash Reporting     Yes       1 d     Cab Reporting     Yes       1 e     CDD     Yes       1 f     EDD     Yes       1 f     EDD     Yes       1 f     Policies and Procedures     Yes       1 h     Periodic Review     Yes       1 h     Risk Assessment     Yes       1 h     Suspicious Activity Reporting     Yes       1 n     Training and Education     Yes       1 n     Training and Education     Yes       2 ls the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior     Yes       3 does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?     Yes       3 a     If Y., provide further details     CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "Intesa		8 8 8	
11 b       Adverse Information Screening         11 c       Beneficial Ownership       Yes         11 d       Cash Reporting       Yes         11 d       EDD       Yes         11 d       Feldoc Review       Yes         11 d       Policies and Procedures       Yes         11 d       Policies and Procedures       Yes         11 d       Sanctions       Yes         11 m       Stappicous Activity Reporting       Yes         11 m       Stappicous Activity Reporting       Yes         11 m       Stappicous Activity Reporting       Yes         11 m       Trainsaction Monitoring       Yes         12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior       Yes         Maaagement Committee?       Yes       Yes         13 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "YUB Bank"), part of the same group led by Integra adopt S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes			
11 c       Beneficial Ownership       Yes         11 d       Cash Reporting       Yes         11 e       CDD       Yes         11 f       EDD       Yes         11 f       EDD       Yes         11 f       EDD       Yes         11 f       Periodic Review       Yes         11 Policies and Procedures       Yes         11 PEP Screening       Yes         11 Sanctions       Yes         11 Sanctions       Yes         11 Sanctions       Yes         11 Trainsing and Education       Yes         12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior       Yes         13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa			Yes
11 d       Cash Reporting       Yes         11 e       CDD       Yes         11 f       EDD       Yes         11 g       Independent Testing       Yes         11 h       Periodic Review       Yes         11 p       Policies and Procedures       Yes         11 p       PEP Screening       Yes         11 k       Risk Assessment       Yes         12 Sanctions       Yes       Yes         13 Transaction Monitoring       Yes       Yes         14 m       Transaction Monitoring       Yes         15 Transaction Monitoring       Yes       Yes         16 Transaction Monitoring       Yes       Yes         17 a       Does the Entity s AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         14 Does the entity have a whistleblower policy?       mutual funds, i.e. VUB, a.s. (hereinafter "UB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report third par			
If e       CDD       Yes         If f       EDD       Yes         If g       Independent Testing       Yes         Ih       Periodic Review       Yes         It i       Policies and Procedures       Yes         It i       Policies and Procedures       Yes         It i       PEP Screening       Yes         It i       Suspicious Activity Reporting       Yes         It in       Suspicious Activity Reporting       Yes         In Training and Education       Yes         In Training and Education       Yes         It in Training and Education       Yes         It is the Entity S AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         It is the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         It a       Does the entity have a whistleblower policy?       CDD, including KYC and EDD, are performed by the currently only distributor of our unual funds, i.e. VÜB, a.s. (hereinafter "UB Bark"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bark"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         It as the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes			
If f       EDD       Yes         If g       Independent Testing       Yes         If h       Periodic Review       Yes         If h       Pelicies and Procedures       Yes         If j       PEP Screening       Yes         If k       Risk Assessment       Yes         If k       Risk Assessment       Yes         If m       Suspicious Activity Reporting       Yes         If m       Suspicious Activity Reporting       Yes         If n       Transaction Monitoring       Yes         If o       Transaction Monitoring       Yes         If o       Transaction Monitoring       Yes         If o       Does the Entity set hird parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         If a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. vUB, a.s. (hereinafter "VUB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         If A       Does the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         If Doees the Entity provide mandatory ABC Policies and Procedures?			
If g     Independent Testing     Yes       11 h     Periodic Review     Yes       11 i     Policies and Procedures     Yes       11 j     PEP Screening     Yes       11 k     Risk Assessment     Yes       11 m     Suspicious Activity Reporting     Yes       11 m     Suspicious Activity Reporting     Yes       11 m     Suspicious Activity Reporting     Yes       11 n     Training and Education     Yes       12 Is the Entity SML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior     Yes       12 Is the Entity SML, CTF & Sanctions programme?     Yes       13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?     Yes       14 Does the entity have a whistleblower policy?     ODD, including KVC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÜB, a.s. (hereinafter "Intesa Sanpaolo Group").       3 Does the entity have a whistleblower policy?     CDD, including KVC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÜB, a.s. (hereinafter "Intesa Sanpaolo Group").       3 ANTI BRIBERY & CORRUPTION     Yes       15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Proced			
11 h       Periodic Review       Yes         11 i       Pelicies and Procedures       Yes         11 j       PEP Screening       Yes         11 k       Risk Assessment       Yes         11 l       Sanctions       Yes         11 m       Suspicious Activity Reporting       Yes         11 m       Suspicious Activity Reporting       Yes         11 n       Suspicious Activity Reporting       Yes         12 lis the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior       Yes         13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "VUB Bank"), part of the same group led by inteas asmaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by inteas asmaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by inteas asmaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by inteas asmaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         16       Does the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other in			
I1 i       Policies and Procedures       Yes         11 j       PEP Screening       Yes         11 k       Risk Assessment       Yes         11 k       Risk Assessment       Yes         11 m       Sanctions       Yes         11 m       Suspicious Activity Reporting       Yes         11 m       Training and Education       Yes         11 o       Transaction Monitoring       Yes         12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. (VLB, a.s. (hereinafter "VUB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17 Does the Entity provide mandatory ABC trainin			
I1 j     PEP Screening     Yes       11 k     Risk Assessment     Yes       11 l     Sanctions     Yes       11 m     Suspicious Activity Reporting     Yes       11 m     Suspicious Activity Reporting     Yes       11 n     Training and Education     Yes       12 ls the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?     Yes       13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?     Yes       13 If Y, provide further details     CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").       3. ANTI BRIBERY & CORRUPTION     Yes       15     Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?     Yes       16     Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?     Yes       17     Des the Entity provide mandatory ABC training to:     Yes       17     To List Line of Defence     Yes			
I1 k       Risk Assessment       Yes         11 I       Sanctions       Yes         11 m       Suspicious Activity Reporting       Yes         11 m       Training and Education       Yes         12 If m       Transaction Monitoring       Yes         12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior       Yes         13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         14 Does the entity have a whistleblower policy?       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÜB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17 Does the Entity provide mandatory ABC training to:       If a Board and Senior Committee Management       No         17 b       1s			
11       Sanctions       Yes         11 m       Suspicious Activity Reporting       Yes         11 n       Training and Education       Yes         11 o       Transaction Monitoring       Yes         12       Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         13       Does the Entity set third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17       Does the Entity Entite Management       No         17       Tost Line of Defence       Yes			
I1 m       Suspicious Activity Reporting       Yes         I1 n       Training and Education       Yes         I1 o       Transaction Monitoring       Yes         I2       Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         I3       Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         I3 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. vUB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "UB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         I5       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         I6       Does the Entity provide mandatory ABC Policies and Procedures?       Yes         I7       Does the Entity provide mandatory ABC training to:       If Yes         I7       Does the Entity provide mandatory ABC training to:       If Yes			
I1 n       Training and Education       Yes         11 o       Transaction Monitoring       Yes         12       Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         13       Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 a       If Y, provide further details       Imagement Committee?         14       Does the entity have a whistleblower policy?       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÜB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRETERY & CORRUPTION       Yes         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity rowide mandatory ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17       Board and Senior Committee Management       No         17       Ist Line of Defence       Yes			
I1 o       Transaction Monitoring       Yes         I2       Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         I3       Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         I3 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         I5       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         I6       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         I7       Does the Entity provide mandatory ABC training to:       Yes         I7 a       Board and Senior Committee Management       No         I7 b       1st Line of Defence       Yes			
12       Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?       Yes         13       Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 a       If Y, provide further details       Yes         14       Does the entity have a whistleblower policy?       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÜB, a.s. (hereinafter "VUB Bank"), part of the same group led by intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       If a Board and Senior Committee Management       No         17 b       1st Line of Defence       Yes       Yes       Yes			
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Management Committee?       Yes         13       Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÚB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Ves         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17       Does the Entity of Defence       Yes		, , , , , , , , , , , , , , , , , , , ,	Yes
13       Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?       Yes         13 a       If Y, provide further details       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VÚB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Yes         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17 b       1st Line of Defence       Yes		, ,	
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14       Does the entity have a whistleblower policy?       CDD, including KYC and EDD, are performed by the currently only distributor of our mutual funds, i.e. VUB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION	13 a		
Does the entity have a whistleblower policy?       mutual funds, i.e. VÚB, a.s. (hereinafter "VUB Bank"), part of the same group led by Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         3. ANTI BRIBERY & CORRUPTION       Itesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       No         17 a       Board and Senior Committee Management       No         17 b       1st Line of Defence       Yes	14	· · · · · · · · · · · · · · · · · · ·	CDD, including KYC and EDD, are performed by the currently only distributor of our
3. ANTI BRIBERY & CORRUPTION         15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       No         17 a       Board and Senior Committee Management       No         17 b       1st Line of Defence       Yes		Does the entity have a whistleblower policy?	mutual funds, i.e. VÚB, a.s. (hereinafter "VUB Bank"), part of the same group led by
15       Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17 a       Board and Senior Committee Management       No         17 b       1st Line of Defence       Yes			Intesa Sanpaolo S.p.A. (hereinafter "Intesa Sanpaolo Group").
consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17 a       Board and Senior Committee Management       No         17 b       1st Line of Defence       Yes			
requirements to reasonably prevent, detect and report bribery and corruption?       Yes         16       Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?       Yes         17       Does the Entity provide mandatory ABC training to:       Yes         17 a       Board and Senior Committee Management       No         17 b       1st Line of Defence       Yes	15		
If equirements to reasonably prevent, detect and report bribery and corruption?       Image: Constraint of the const			Yes
I6     Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?     Yes       I7     Does the Entity provide mandatory ABC training to:     No       I7 a     Board and Senior Committee Management     No       I7 b     1st Line of Defence     Yes			
independent third party cover ABC Policies and Procedures?     Yes       17     Does the Entity provide mandatory ABC training to:     Image: Comparison of Committee Management       17 a     Board and Senior Committee Management     No       17 b     1st Line of Defence     Yes	10		
Procedures?       I7     Does the Entity provide mandatory ABC training to:       I7 a     Board and Senior Committee Management       I7 b     1st Line of Defence	16		N
I7     Does the Entity provide mandatory ABC training to:       I7 a     Board and Senior Committee Management       I7 b     1st Line of Defence			Yes
I7 a     Board and Senior Committee Management     No       I7 b     1st Line of Defence     Yes	47		
17 b 1st Line of Defence Yes			N.
Yes			
	1/ C	Zhu Line of Defence	Yes

17 d	2rd Line of Defense	Vac
17 a 17 e	3rd Line of Defence Third parties to which specific compliance activities	Yes
17 6	subject to ABC risk have been outsourced	No
17 f	Non-employed workers as appropriate	
	(contractors/consultants)	No
4. AML, C	CTF & SANCTIONS POLICIES & PROCEDURES	
18	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent, detect	
	and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c 19	Sanctions violations	Yes
19 19 a	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	
15 a	fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for	No.
	unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking	Yes
	services to unlicensed banks	
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services	Yes
19 f	to shell banks Prohibit opening and keeping of accounts for Section 311	
191	designated entities	Yes
19 g	Prohibit opening and keeping of accounts for any of	
	unlicensed/unregulated remittance agents, exchanges	
	houses, casa de cambio, bureaux de change or money	Yes
	transfer agents	
19 h	Assess the risks of relationships with domestic and	Yes
10.	foreign PEPs, including their family and close associates	
19 i	Define the process for escalating financial crime risk	Van
	issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions,	
,	PEPs and Adverse Media/Negative News	Yes
20	Has the Entity defined a risk tolerance statement or similar	
	document which defines a risk boundary around their	Yes
	business?	
21	Does the Entity have record retention procedures that	Yes
21 a	comply with applicable laws? If Y, what is the retention period?	5 years or more
	CDD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD	
	must be completed, e.g. at the time of onboarding or within	Yes
	30 days?	
24	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c 24 d	Nature of business/employment Ownership structure	Yes Yes
24 a 24 e	Product usage	Yes
24 e 24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes Yes
25 b 25 c	Authorised signatories (where applicable) Key controllers	
25 b 25 c 25 d	Authorised signatories (where applicable) Key controllers Other relevant parties	Yes
25 b 25 c	Authorised signatories (where applicable) Key controllers Other relevant parties Does the due diligence process result in customers	Yes
25 b 25 c 25 d 26	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?	Yes Yes
25 b 25 c 25 d	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening	Yes Yes
25 b 25 c 25 d 26	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?	Yes Yes
25 b 25 c 25 d 26	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they	Yes Yes
25 b 25 c 25 d 26 27	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they         are PEPs, or controlled by PEPs?         Does the Entity have policies, procedures and processes to         review and escalate potential matches from screening	Yes Yes Yes
25 b 25 c 25 d 26 27	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they         are PEPs, or controlled by PEPs?         Does the Entity have policies, procedures and processes to         review and escalate potential matches from screening         customers and connected parties to determine whether they	Yes Yes Yes
25 b 25 c 25 d 26 27 28	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they         are PEPs, or controlled by PEPs?         Does the Entity have policies, procedures and processes to         review and escalate potential matches from screening         customers and connected parties to determine whether they	Yes Yes Yes
25 b 25 c 25 d 26 27	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they         are PEPs, or controlled by PEPs?         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?         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?         Is KYC renewed at defined frequencies based on risk rating	Yes Yes Yes
25 b 25 c 25 d 26 27 28 29	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they         are PEPs, or controlled by PEPs?         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?         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?         Is KYC renewed at defined frequencies based on risk rating         (Periodic Reviews)?	Yes Yes Yes Yes
25 b 25 c 25 d 26 27 28	Authorised signatories (where applicable)         Key controllers         Other relevant parties         Does the due diligence process result in customers         receiving a risk classification?         Does the Entity have a risk based approach to screening         customers and connected parties to determine whether they         are PEPs, or controlled by PEPs?         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?         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?         Is KYC renewed at defined frequencies based on risk rating	Yes Yes Yes Yes

<u>.</u>	4.0	
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	Yes
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	
30	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?	
30 a	Arms, Defence, Military	Restricted
30 b	Respondent Banks	EDD on a risk based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
30 c	Embassies/Consulates	EDD on a risk based approach
30 d	Extractive industries	EDD on a risk based approach
30 e	Gambling customers	EDD on a risk based approach
30 f	General Trading Companies	EDD on a risk based approach
30 g	Marijuana-related Entities	Prohibited
30 h	MSB/MVTS customers	EDD on a risk based approach
30 i	Non-account customers	Prohibited
30 j	Non-Government Organisations	
		EDD on a risk based approach
30 k	Non-resident customers	EDD on a risk based approach
30	Nuclear power	EDD on a risk based approach
30 m	Payment Service Providers	EDD on a risk based approach
30 n	PEPs	EDD on a risk based approach
30 o	PEP Close Associates	EDD on a risk based approach
30 p	PEP Related	EDD on a risk based approach
30 q	Precious metals and stones	EDD on a risk based approach
30 r	Red light businesses/Adult entertainment	Prohibited
30 s	Regulated charities	EDD on a risk based approach
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on a risk based approach
30 v	Unregulated charities	EDD on a risk based approach
30 w	Used Car Dealers	EDD on a risk based approach
30 w 30 x	Virtual Asset Service Providers	
		EDD on a risk based approach
30 y 31	Other (specify) If restricted, provide details of the restriction	For gambling, only the companies licensed by Slovak/Czech government are
		allowed with restrictions in financing of these activities. Please bear in mind that the onboarding of customers is done by the distributor of our mutual funds, i.e. VUB Bank (part of the same Intesa Sanpaolo Group), to which we outsource CDD. See also details provided by VUB bank in the Wolfsberg superior prior which ad on the superbala
		questionnaire published on their website.
	ORING & REPORTING	
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	all transactions that receive a flag in the automated screening
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYME	NT TRANSPARENCY	
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	No
37 b	Local Regulations	No
37 b1	If Y, Specify the regulation	
37 c	If N, explain	We are NOT a payment institution. For payments, we are a customer using VUB Bank as a payment institution (part of the same Intesa Sanpaolo Group), which adheres to all payment-related standards, regulations and recommendations, as mentioned above, including the local Act No 492/2009 on payment services.
8. SANCT	IONS	

38	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
39	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
40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
41 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
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
41 e	Lists maintained by other G7 member countries	Not used
41 f	Other (specify)	Internal lists (e.g. Intesa Sanpaolo bad guys list, VUB Bank local black lists) are used by the distributor of our mutual funds, i.e. VUB Bank (part of the same Intesa Sanpaolo Group), to which we outsource CDD.
42	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?	
9. TRAIN	NING & EDUCATION	1
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	No
44 f	Non-employed workers (contractors/consultants)	No
10. AUD	IT	
45	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, ABC, Fraud	Yes

## Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ V1.2)

Eurizon Asset Management Slovakia, správ.spol.,a.s.

I, Jana Repová (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.

17.7.2024

(Signature & Date)