



Financial Institution Name:

ADEPA Asset Management S.A.

Location (Country) :

GRAND-DUCHY OF LUXEMBOURG

No #	Question	Answer
<b>. ENTITY &amp; OWNERSHIP</b>		
	Full Legal name	ADEPA Asset Management S.A.
	Append a list of foreign branches which are covered by this questionnaire (if applicable)	ADEPA Asset Management S.A., Italy Branch registered in 7, Alberico Albricci, 20122 , Milano, Italy ADEPA Asset Management S.A., Spain Branch registered in Calle José Lázaro Galdiano 2, 1A 28036 Madrid - Spain
	Full Legal (Registered) Address	6A rue Gabriel Lippmann, L-5365 Munsbach, Grand-Duchy of Luxembourg
	Full Primary Business Address (if different from above)	n/a
	Date of Entity incorporation / establishment	15.03.2006 in Luxembourg
	Select type of ownership and append an ownership chart if available	No
<b>a</b>	Publicly Traded (25% of shares publicly traded)	No
<b>a1</b>	If Y, indicate the exchange traded on and ticker symbol	n/a
<b>b</b>	Member Owned / Mutual	No
<b>c</b>	Government or State Owned by 25% or more	No
<b>d</b>	Privately Owned	Yes
<b>d1</b>	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	ADEPA is fully owned by ADEPA Global Services S.A., which is fully owned by Mr. Carlos Alberto Morales López.
	% of the Entity's total shares composed of bearer shares	0%
	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
<b>a</b>	If Y, provide the name of the relevant branch/es which operate under an OBL	n/a

**AML, CTF & SANCTIONS PROGRAMME**

	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>a</b>	Appointed Officer with sufficient experience / expertise	Yes
<b>b</b>	Cash Reporting	Yes
<b>c</b>	CDD	Yes
<b>d</b>	EDD	Yes
<b>e</b>	Beneficial Ownership	Yes
<b>f</b>	Independent Testing	Yes
<b>g</b>	Periodic Review	Yes
<b>h</b>	Policies and Procedures	Yes
<b>i</b>	Risk Assessment	Yes
<b>j</b>	Sanctions	Yes
<b>k</b>	PEP Screening	Yes
<b>l</b>	Adverse Information Screening	Yes
<b>m</b>	Suspicious Activity Reporting	Yes
<b>n</b>	Training and Education	Yes
<b>o</b>	Transaction Monitoring	Yes
<b>0</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
<b>1</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
<b>1a</b>	If Y, provide further details	TA function for some funds delegated

**. ANTI BRIBERY & CORRUPTION**

<b>2</b>	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
<b>3</b>	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
<b>4</b>	Does the Entity provide mandatory ABC training to:	
<b>4 a</b>	Board and Senior Committee Management	Yes
<b>4 b</b>	1st Line of Defence	Yes
<b>4 c</b>	2nd Line of Defence	Yes
<b>4 d</b>	3rd Line of Defence	Yes
<b>4 e</b>	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
<b>4 f</b>	Non-employed workers as appropriate (contractors / consultants)	No

**AML, CTF & SANCTIONS POLICIES & PROCEDURES**

<b>5</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>5 a</b>	Money laundering	Yes
<b>5 b</b>	Terrorist financing	Yes
<b>5 c</b>	Sanctions violations	Yes
<b>6</b>	Does the Entity have policies and procedures that:	
<b>6 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
<b>6 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
<b>6 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
<b>6 d</b>	Prohibit accounts / relationships with shell banks	Yes
<b>6 e</b>	Prohibit dealing with another Entity that provides services to shell banks	Yes
<b>6 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
<b>6 g</b>	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
<b>6 h</b>	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
<b>6 i</b>	Define escalation processes for financial crime risk issues	Yes
<b>6 j</b>	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
<b>6 k</b>	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
<b>7</b>	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
<b>8</b>	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
<b>8 a</b>	If Y, what is the retention period?	5 years or more

**. KYC, CDD and EDD**

<b>9</b>	Does the Entity verify the identity of the customer?	Yes
<b>0</b>	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
<b>1</b>	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
<b>1 a</b>	Ownership structure	Yes
<b>1 b</b>	Customer identification	Yes
<b>1 c</b>	Expected activity	Yes
<b>1 d</b>	Nature of business / employment	Yes
<b>1 e</b>	Product usage	Yes
<b>1 f</b>	Purpose and nature of relationship	Yes
<b>1 g</b>	Source of funds	Yes
<b>1 h</b>	Source of wealth	Yes
<b>2</b>	Are each of the following identified:	
<b>2 a</b>	Ultimate beneficial ownership	Yes
<b>2 a1</b>	Are ultimate beneficial owners verified?	Yes
<b>2 b</b>	Authorised signatories (where applicable)	Yes
<b>2 c</b>	Key controllers	Yes
<b>2 d</b>	Other relevant parties	
<b>3</b>	Does the due diligence process result in customers receiving a risk classification?	Yes
<b>4</b>	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
<b>5</b>	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
<b>6</b>	Does the Entity have a process to review and update customer information based on:	
<b>6 a</b>	KYC renewal	Yes
<b>6 b</b>	Trigger event	Yes



<b>7</b>	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?	
<b>7 a</b>	Non-account customers	Do not have this category of customer or industry
<b>7 b</b>	Non-resident customers	EDD on a risk based approach
<b>7 c</b>	Shell banks	Prohibited
<b>7 d</b>	MVTS/ MSB customers	EDD on a risk based approach
<b>7 e</b>	PEPs	EDD on a risk based approach
<b>7 f</b>	PEP Related	EDD on a risk based approach
<b>7 g</b>	PEP Close Associate	EDD on a risk based approach
<b>7 h</b>	Correspondent Banks	EDD on a risk based approach
<b>7 h1</b>	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
<b>7 i</b>	Arms, defense, military	EDD on a risk based approach
<b>7 j</b>	Atomic power	EDD on a risk based approach
<b>7 k</b>	Extractive industries	EDD on a risk based approach
<b>7 l</b>	Precious metals and stones	Prohibited
<b>7 m</b>	Unregulated charities	EDD on a risk based approach
<b>7 n</b>	Regulated charities	EDD on a risk based approach
<b>7 o</b>	Red light business / Adult entertainment	EDD on a risk based approach
<b>7 p</b>	Non-Government Organisations	EDD on a risk based approach
<b>7 q</b>	Virtual currencies	Prohibited
<b>7 r</b>	Marijuana	Prohibited
<b>7 s</b>	Embassies / Consulates	EDD on a risk based approach
<b>7 t</b>	Gambling	EDD on a risk based approach
<b>7 u</b>	Payment Service Provider	EDD on a risk based approach
<b>7 v</b>	Other (specify)	n/a
<b>8</b>	If restricted, provide details of the restriction	n/a

**MONITORING & REPORTING**

9	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
0	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
1	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
1 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
2	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes

**. PAYMENT TRANSPARENCY**

<b>3</b>	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
<b>4</b>	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
<b>4 a</b>	FATF Recommendation 16	Yes
<b>4 b</b>	Local Regulations	Yes
<b>4 b1</b>	Specify the regulation	<ul style="list-style-type: none"><li>- Law of 2004 means the Law of 12 November 2004 on the fight against money laundering and terrorist financing, as amended</li><li>- Law of 27 October 2010, enhancing the anti-money laundering and counter terrorist financing legal framework</li><li>- Law of 5 April 1993 on the financial sector, as amended</li><li>- CSSF Regulation No. 12-02...</li></ul>
<b>4 c</b>	If N, explain	n/a



**. SANCTIONS**

<b>5</b>	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
<b>6</b>	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
<b>7</b>	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
<b>7 a</b>	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
<b>7 b</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
<b>7 c</b>	Office of Financial Sanctions Implementation HMT (OFSI)	Not used
<b>7 d</b>	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
<b>7 e</b>	Lists maintained by other G7 member countries	Not used
<b>7 f</b>	Other (specify)	n/a
<b>8</b>	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No

**9. TRAINING & EDUCATION**

<b>9</b>	Does the Entity provide mandatory training, which includes :	
<b>9 a</b>	Identification and reporting of transactions to government authorities	Yes
<b>9 b</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
<b>9 c</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
<b>9 d</b>	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
<b>0</b>	Is the above mandatory training provided to :	all employees
<b>0 a</b>	Board and Senior Committee Management	Yes
<b>0 b</b>	1st Line of Defence	Yes
<b>0 c</b>	2nd Line of Defence	Yes
<b>0 d</b>	3rd Line of Defence	Yes
<b>0 e</b>	3rd parties to which specific FCC activities have been outsourced	No
<b>0 f</b>	Non-employed workers (contractors / consultants)	No



## 0. AUDIT

1	In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
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**Signature Page**

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

ADEPA Asset Management S.A.

(Financial Institution name)

Francisco Garcia Figueroa

(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.

30/01/2023

(Signature & Date)