



Financial Institution Name:

Van Lanschot Kempen N.V.

Location (Country) :

The Netherlands

| No #                             | Question  | Answer   |
|----------------------------------|---|--|
| <b>1. ENTITY &amp; OWNERSHIP</b> |   |  |
| 1                                | Full Legal name   | Van Lanschot Kempen N.V.   |
| 2                                | Append a list of foreign branches which are covered by this questionnaire (if applicable)         | Kempen Capital Management N.V.<br>Kempen Capital Management UK Ltd.<br>Van Lanschot België<br>Kempen & Co USA Inc. |
| 3                                | Full Legal (Registered) Address   | Hooge Steenweg 29<br>5211JN 's-Hertogenbosch<br>The Netherlands  |
| 4                                | Full Primary Business Address (if different from above)   | Beethovenstraat 300<br>1077 WZ Amsterdam<br>The Netherlands  |
| 5                                | Date of Entity incorporation / establishment  | 09-03-1970   |
| 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   | Exchange traded: Euronext Amsterdam<br>Ticker: VLK   |
| 6 b                              | Member Owned / Mutual   | No   |
| 6 c                              | Government or State Owned by 25% or more  | No   |
| 6 d                              | Privately Owned   | Yes  |
| 6 d1                             | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | Romij B.V. (KvK/CoC 06047235)  |
| 7                                | % of the Entity's total shares composed of bearer shares  | 0  |
| 8                                | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?        | No   |
| 8 a                              | If Y, provide the name of the relevant branch/es which operate under an OBL                       |  |

| <b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b> |  |   |
|--|--|---|
| <b>9</b>                                     | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:        |   |
| <b>9 a</b>                                   | Appointed Officer with sufficient experience / expertise   | Yes   |
| <b>9 b</b>                                   | Cash Reporting   | Yes   |
| <b>9 c</b>                                   | CDD  | Yes   |
| <b>9 d</b>                                   | EDD  | Yes   |
| <b>9 e</b>                                   | Beneficial Ownership   | Yes   |
| <b>9 f</b>                                   | Independent Testing  | Yes   |
| <b>9 g</b>                                   | Periodic Review  | Yes   |
| <b>9 h</b>                                   | Policies and Procedures  | Yes   |
| <b>9 i</b>                                   | Risk Assessment  | Yes   |
| <b>9 j</b>                                   | Sanctions  | Yes   |
| <b>9 k</b>                                   | PEP Screening  | Yes   |
| <b>9 l</b>                                   | Adverse Information Screening  | Yes   |
| <b>9 m</b>                                   | Suspicious Activity Reporting  | Yes   |
| <b>9 n</b>                                   | Training and Education   | Yes   |
| <b>9 o</b>                                   | Transaction Monitoring   | Yes   |
| <b>10</b>                                    | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | No  |
| <b>11</b>                                    | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?                           | Yes   |
| <b>11a</b>                                   | If Y, provide further details  | In some cases identification and verification take place by professional third parties. In these cases, agreements are put in place to ensure that Van Lanschot Kempen N.V. fulfills its legal obligations. |

| <b>3. ANTI BRIBERY &amp; CORRUPTION</b> |  |     |
|---|--|-----|
| <b>12</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>13</b>                               | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  | Yes |
| <b>14</b>                               | Does the Entity provide mandatory ABC training to:   |     |
| <b>14 a</b>                             | Board and Senior Committee Management  | Yes |
| <b>14 b</b>                             | 1st Line of Defence  | Yes |
| <b>14 c</b>                             | 2nd Line of Defence  | Yes |
| <b>14 d</b>                             | 3rd Line of Defence  | Yes |
| <b>14 e</b>                             | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced   | Yes |
| <b>14 f</b>                             | Non-employed workers as appropriate (contractors / consultants)  | Yes |

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

| 5. KYC, CDD and EDD |  |     |
|---------------------|--|-----|
| 19                  | Does the Entity verify the identity of the customer?   | Yes |
| 20                  | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days   | Yes |
| 21                  | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:   |     |
| 21 a                | Ownership structure  | Yes |
| 21 b                | Customer identification  | Yes |
| 21 c                | Expected activity  | Yes |
| 21 d                | Nature of business / employment  | Yes |
| 21 e                | Product usage  | Yes |
| 21 f                | Purpose and nature of relationship   | Yes |
| 21 g                | Source of funds  | Yes |
| 21 h                | Source of wealth   | Yes |
| 22                  | Are each of the following identified:  |     |
| 22 a                | Ultimate beneficial ownership  | Yes |
| 22 a1               | Are ultimate beneficial owners verified?   | Yes |
| 22 b                | Authorised signatories (where applicable)  | Yes |
| 22 c                | Key controllers  | Yes |
| 22 d                | Other relevant parties   | N/A |
| 23                  | Does the due diligence process result in customers receiving a risk classification?  | Yes |
| 24                  | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?   | Yes |
| 25                  | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 26                  | Does the Entity have a process to review and update customer information based on:   |     |
| 26 a                | KYC renewal  | Yes |
| 26 b                | Trigger event  | Yes |

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|              |   |  |
|--------------|---|--|
| <b>27</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>27 a</b>  | Non-account customers   | Prohibited   |
| <b>27 b</b>  | Non-resident customers  | EDD & restricted on a risk based approach                                  |
| <b>27 c</b>  | Shell banks   | Prohibited   |
| <b>27 d</b>  | MVTS/ MSB customers   | Prohibited   |
| <b>27 e</b>  | PEPs  | EDD on a risk based approach   |
| <b>27 f</b>  | PEP Related   | EDD on a risk based approach   |
| <b>27 g</b>  | PEP Close Associate   | EDD on a risk based approach   |
| <b>27 h</b>  | Correspondent Banks   | EDD & restricted on a risk based approach                                  |
| <b>27 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>27 i</b>  | Arms, defense, military   | EDD & restricted on a risk based approach                                  |
| <b>27 j</b>  | Atomic power  | Prohibited   |
| <b>27 k</b>  | Extractive industries   | EDD & restricted on a risk based approach                                  |
| <b>27 l</b>  | Precious metals and stones  | EDD & restricted on a risk based approach                                  |
| <b>27 m</b>  | Unregulated charities   | EDD & restricted on a risk based approach                                  |
| <b>27 n</b>  | Regulated charities   | EDD on a risk based approach   |
| <b>27 o</b>  | Red light business / Adult entertainment  | EDD & restricted on a risk based approach                                  |
| <b>27 p</b>  | Non-Government Organisations  | EDD on a risk based approach   |
| <b>27 q</b>  | Virtual currencies  | EDD & restricted on a risk based approach                                  |
| <b>27 r</b>  | Marijuana   | Prohibited   |
| <b>27 s</b>  | Embassies / Consulates  | EDD on a risk based approach   |
| <b>27 t</b>  | Gambling  | EDD & restricted on a risk based approach                                  |
| <b>27 u</b>  | Payment Service Provider  | EDD & restricted on a risk based approach                                  |
| <b>27 v</b>  | Other (specify)   | N/A  |
| <b>28</b>    | If restricted, provide details of the restriction   | Restrictions are on services rendered and annual CDD reviews are performed |

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

| 7. PAYMENT TRANSPARENCY |   |   |
|-------------------------|---|---|
| 33                      | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?   | Yes   |
| 34                      | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: |   |
| 34 a                    | FATF Recommendation 16  | Yes   |
| 34 b                    | Local Regulations   | Yes   |
| 34 b1                   | Specify the regulation  | Wet ter voorkoming van witwassen en terrorismefinanciering (Wwft, Dutch implementation of the 5th EU AML Directive) |
| 34 c                    | If N, explain   |   |



| 8. SANCTIONS |  |   |
|--------------|--|---|
| 35           | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions? | Yes   |
| 36           | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  | Yes   |
| 37           | Select the Sanctions Lists used by the Entity in its sanctions screening processes:  |   |
| 37 a         | Consolidated United Nations Security Council Sanctions List (UN)   | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 b         | United States Department of the Treasury's Office of Foreign Assets Control (OFAC)   | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 c         | Office of Financial Sanctions Implementation HMT (OFSI)  | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 d         | European Union Consolidated List (EU)  | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 e         | Lists maintained by other G7 member countries  | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 f         | Other (specify)  | Local sanction lists of The Netherlands, Belgium, Luxembourg, France and Switzerland.   |
| 38           | Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?   | No  |

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

**10. AUDIT**

|    |   |     |
|----|---|-----|
| 41 | In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis? | Yes |
|----|---|-----|

**Signature Page**

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[Redacted box]

(Financial Institution name)

I, [Redacted box]

(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.

[Redacted box]

(Signature & Date)