

## AML Questionnaire

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### 1. General Information

- Full name of the institution?  
*St. Galler Kantonalbank AG*
- Registered address?  
*St. Leonhardstrasse 25, CH-9001 St. Gallen*
- Country of domicile?  
*Switzerland (CH)*
- Please provide the names of the senior management of your institution.  
*Dr. Christian Schmid, CEO*  
*Patrick Graf, Head of Corporate Center*  
*Dr. Falk Kohlmann, Head of Market Services*  
*Dr. Hanspeter Wohlwend, Head of Private Banking*  
*René Walser, Head of Retail and Commercial Clients*
- Does your institution maintain a physical presence in the licensing country?  
*Yes.*
- Is your institution a publicly traded entity?  
*Yes.*
- Please list the exchanges and symbols.  
*SIX Swiss Exchange*  
*SGKN*
- Is your institution publicly owned?  
*Yes, partly (51% owned by the Canton of St. Gallen).*
- Is your institution an agency, branch or subsidiary of a bank with physical presence?  
*No.*
- Please provide the name(s) of any shareholder(s) holding more than 20 percent of shares in your institution  
*Canton of St. Gallen (51%)*

## 2. General AML Policies, Practices and Procedures:

11. Are there legislation and regulations enacted for anti-money laundering (AML-Regulations) in your country?  
*Yes, Switzerland belongs to the most regulated countries concerning anti-money laundering in the world.*
12. Are there specific laws and/or regulations in place covering anti-money laundering?  
*Yes.*
13. Does the AML compliance program require approval of the FI's Board or a senior committee thereof?  
*Yes.*
14. Does your anti-money laundering policy and programme include:
  - 14.1 Customer identification requirements at the inception of the relationship?  
*Yes, Swiss law requires this.*
  - 14.2 Staff training programme on AML?  
*Yes, Swiss law requires this.*
  - 14.3 Internal controls and procedures for detecting and reporting of suspicious transactions?  
*Yes, Swiss law requires this.*
15. Are your anti-money laundering policy and programme applicable to your overseas branches and subsidiaries?  
*We do not have any overseas branches or subsidiaries.*
16. Does St.Galler Kantonalbank AG have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?  
*Yes.*
17. Has St.Galler Kantonalbank AG developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?  
*Yes.*
18. In addition to inspections by the government supervisors/regulators, does St.Galler Kantonalbank AG have an internal audit function or other independent third party that assesses AML policies and practises on a regular basis?  
*Yes, Swiss law requires this.*
19. Does St.Galler Kantonalbank AG have policies prohibiting accounts/relationships with shell banks (a shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group)?  
*Yes, Swiss law requires this.*
20. Does St.Galler Kantonalbank AG have policies covering relationships with politically exposed persons (PEP) consistent with industry best practices?  
*Yes, Swiss law requires this.*
21. Does St.Galler Kantonalbank AG have appropriate record retention procedures pursuant to applicable law?  
*Yes.*
22. Does St.Galler Kantonalbank AG require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?  
*Yes, as far as local law is respected.*
23. Does St.Galler Kantonalbank AG have written procedures to prevent the risk of money laundering?  
*Yes.*
24. If so, do they include procedures for identifying new customers and where applicable, confirming the legitimacy of their business?  
*Yes.*
25. Does St.Galler Kantonalbank AG conduct business such as sale of monetary instruments or funds transfers for "walk-in" customers?  
*Currency exchange only. We identify "walk-in-customers" with e.g. passports or ID-cards.*
26. Does St.Galler Kantonalbank AG open and keep anonymous and fictious named accounts?  
*No.*

### 3. Law / Regulation

27. Does your institution conduct business at a physical address in a jurisdiction in which your institution is authorised to engage in banking and/or financial activities?  
*See [www.finma.ch](http://www.finma.ch) "authorised institutions".*
28. Please provide the name of the regulatory authority your institution is subjected to.  
*Swiss Financial Market Supervisory Authority, [www.finma.ch](http://www.finma.ch)*
29. Do the laws and regulations in your jurisdiction limit or prohibit the opening or maintenance of anonymous or numbered accounts?  
*No, however the customer identification requirements at the inception of the relationship have to be obeyed.*

### 4. Risk Assessment

30. Does St.Galler Kantonalbank AG have a risk focused assessment of its customer base and transactions of its customers?  
*Yes.*
31. Does St.Galler Kantonalbank AG determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through St.Galler Kantonalbank AG?  
*Yes.*

### 5. Know Your Customer, Due Diligence and Enhanced Due Diligence

32. Has St.Galler Kantonalbank AG implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example: name, nationality, street address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?  
*Yes.*
33. Does St.Galler Kantonalbank AG have a requirement to collect information regarding its customers' business?  
*Yes.*
34. Does St.Galler Kantonalbank AG collect information and assess its FI customers' AML policies or practices?  
*Yes.*
35. Does St.Galler Kantonalbank AG have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?  
*Yes.*
36. Does St.Galler Kantonalbank AG take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?  
*Yes.*
37. Does St.Galler Kantonalbank AG have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?  
*Yes.*
38. Does St.Galler Kantonalbank AG have procedures to identify transactions structured to avoid large cash reporting requirements?  
*Yes.*
39. Does St.Galler Kantonalbank AG screen transactions for customers or transactions St.Galler Kantonalbank AG deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?  
*Yes.*
40. Does St.Galler Kantonalbank AG have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products (a shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group)?  
*Yes.*
41. Does St.Galler Kantonalbank AG have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?  
*Yes.*

## 6. Transaction Monitoring

42. Does St.Galler Kantonalbank AG have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers checks, money orders, etc.)?  
Yes.

## 7. Contacts

43. Compliance Officer responsible for account/relationship

*Dr. Christoph Schönenberger, Head Legal & Compliance*

*Phone: 0041 71 231 33 20*

*Email: [christoph.schoenenberger@sgkb.ch](mailto:christoph.schoenenberger@sgkb.ch)*

*Dr. Claudia Oesch, Compliance Officer AML*

*Phone: 0041 71 231 33 09*

*Email: [claudia.oesch@sgkb.ch](mailto:claudia.oesch@sgkb.ch)*

## 8. Links

44. Regulatory authority  
[www.finma.ch](http://www.finma.ch)  
<https://www.finma.ch/en/finma-public/authorised-institutions-individuals-and-products/>
45. Regulations  
<https://www.finma.ch/en/documentation/legal-basis/laws-and-ordinances/>
46. Stock exchange  
[https://www.six-group.com/exchanges/index\\_en.html](https://www.six-group.com/exchanges/index_en.html)  
<https://www.six-group.com/en/market-data/shares/share-explorer/share-details.CH0011484067CHF4.html#/>
47. St.Galler Kantonalbank AG  
[www.sgkb.ch](http://www.sgkb.ch)

St.Gallen, April 7, 2025