the Wolfsberg Group

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| Financial Institution Name: | FALCORE B.V. |
| Location (Country) : | The Netherlands |

| No # | Question | Answer |
|---|---|---|
| **1. ENTITY & OWNERSHIP** | | |
| 1 | Full Legal name | FALCORE B.V. |
| 2 | Append a list of foreign branches which are covered by this questionnaire (if applicable) | FALCORE B.V., Belgian Branch |
| 3 | Full Legal (Registered) Address | Beethovenstraat 300, 1077 WZ, Amsterdam, The Netherlands |
| 4 | Full Primary Business Address (if different from above) | N/A |
| 5 | Date of Entity incorporation/establishment | 30 January 2026 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | No |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | N/A |
| 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 | KBS Securities NV 50% and Van Lanschot Kempen N.V. 50%. There are no UBOs with a holding of 10% or more. |
| 7 | % of the Entity's total shares composed of bearer shares | N/A |
| 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 | N/A |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| 10 | Provide Legal Entity Identifier (LEI) if available | 7245009TT8HD2ZOJGM95 |
| **2. AML, CTF & SANCTIONS PROGRAMME** | | |
| 11 | 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 d | Cash Reporting | Not Applicable |
| 11 e | CDD | Yes |
| 11 f | EDD | Yes |

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| 11 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 l | 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 use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 13 a | If Y, provide further details | AML/CTF training and certain operational activities (CDD (outsourcing), transaction monitoring (secondment)) are supported by third parties, while decision-making and accountability remain with FALCORE B.V.. |
| 14 | Does the entity have a whistleblower policy? | Yes |
| **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: | |
| 17 a | Board and Senior Committee Management | Yes |
| 17 b | 1st Line of Defence | Yes |
| 17 c | 2nd Line of Defence | Yes |
| 17 d | 3rd Line of Defence | Yes |
| 17 e | Third parties to which specific compliance activities subject to ABC risk have been outsourced | Yes |
| 17 f | Non-employed workers as appropriate (contractors/consultants) | Yes |
| **4. AML, 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 | Sanctions violations | Yes |
| 19 | Does the Entity have policies and procedures that: | |
| 19 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| 19 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| 19 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| 19 d | Prohibit accounts/relationships with shell banks | Yes |
| 19 e | Prohibit dealing with another Entity that provides services to shell banks | Yes |
| 19 f | Prohibit opening and keeping of accounts for Section 311 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 transfer agents | Yes |
| 19 h | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |
| 19 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
| 19 j | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |

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| 20 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 21 | Does the Entity have record retention procedures that comply with applicable laws? | Yes |
| 21 a | If Y, what is the retention period? | 5 years or more |
| **5. KYC, 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 30 days? | Yes |
| 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 | Nature of business/employment | Yes |
| 24 d | Ownership structure | Yes |
| 24 e | Product usage | Yes |
| 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 |
| 25 c | Key controllers | Yes |
| 25 d | Other relevant parties | Yes |
| 26 | Does the due diligence process result in customers receiving a risk classification? | Yes |
| 27 | 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 |
| 28 | 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 |
| 29 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes |
| 29 a | If yes, select all that apply: | |
| 29 a1 | Less than one year | No |
| 29 a2 | 1 – 2 years | Yes |
| 29 a3 | 3 – 4 years | Yes |
| 29 a4 | 5 years or more | No |
| 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 | Always subject to EDD |
| 30 b | Respondent Banks | Do not have this category of customer or industry |
| 30 b1 | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Please select |
| 30 c | Embassies/Consulates | Do not have this category of customer or industry |
| 30 d | Extractive industries | Prohibited |
| 30 e | Gambling customers | Prohibited |
| 30 f | General Trading Companies | EDD on risk-based approach |
| 30 g | Marijuana-related Entities | Restricted |
| 30 h | MSB/MVTS customers | Prohibited |
| 30 i | Non-account customers | Prohibited |
| 30 j | Non-Government Organisations | EDD on risk based approach |
| 30 k | Non-resident customers | Restricted |

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| 30 l | Nuclear power | Prohibited |
| 30 m | Payment Service Providers | EDD on risk based approach |
| 30 n | PEPs | Always subject to EDD |
| 30 o | PEP Close Associates | Always subject to EDD |
| 30 p | PEP Related | Always subject to EDD |
| 30 q | Precious metals and stones | EDD on risk based approach |
| 30 r | Red light businesses/Adult entertainment | Always subject to EDD |
| 30 s | Regulated charities | EDD on risk-based approach |
| 30 t | Shell banks | Prohibited |
| 30 u | Travel and Tour Companies | EDD on risk-based approach |
| 30 v | Unregulated charities | EDD on risk-based approach |
| 30 w | Used Car Dealers | Do not have this category of customer or industry |
| 30 x | Virtual Asset Service Providers | Prohibited |
| 30 y | Other (specify) | N/A |
| 31 | If restricted, provide details of the restriction | Relationships are restricted where the Client is active in sectors associated with elevated financial crime, regulatory or reputational risks, or where risks cannot be sufficiently mitigated. In such cases, onboarding is subject to additional scrutiny and approval, and may be declined if insufficient transparency on ownership, source of funds, or business activities is |
| **6. MONITORING & 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 | Alerts and potential matches generated by screening systems, which are reviewed and investigated by the Desk and escalated to AMLCO where required. |
| 34 | Does the Entity have regulat ory 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. PAYMENT TRANSPARENCY** | | |
| 36 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |
| 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 | Yes |
| 37 b | Local Regulations | Yes |
| 37 b1 | If Y, Specify the regulation | FATF Recommendation 16 (Wire Transfer Rule) as implemented under the EU legal framework, including Regulation (EU) 2015/847 on information accompanying transfers of funds, and applicable Dutch (Wwft) and Belgian AML/CFT legislation (Law of 18 September 2017 and related regulations), to the extent applicable to the Entity's business model |
| 37 c | If N, explain | N/A |
| **8. SANCTIONS** | | |
| 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 |

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| 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 transact |
| 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 transact |
| 41 c | Office of Financial Sanctions Implementation HMT (OFSI) | Not used |
| 41 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transact |
| 41 e | Lists maintained by other G7 member countries | Used for screening customers and beneficial owners and for filtering transact |
| 41 f | Other (specify) | The OFSI Consolidated List has been discontinued as of 28 January 2026 and replaced by the UK Sanctions List, which is in scope of the sanctions screening process. |
| 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? | No |
| **9. TRAINING & EDUCATION** | | |
| 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 | Yes |
| 44 f | Non-employed workers (contractors/consultants) | Yes |
| **10. AUDIT** | | |
| 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 and Sanctions policies and practices on a regular basis? | Yes |

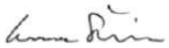
**Signature Page**

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

FALCORE B.V.

_____ (Financial Institution name)

I, Ivana Sucur _____ (Chief Risk Officer), 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.

5 November 2026  _____ (Signature & Date)