

Anti-Money Laundering (“AML”) and Sanctions Due Diligence Information for State Street

Introduction

This completed questionnaire is designed to provide information about State Street's Global AML and Sanctions policies and procedures as well as its products, services, and customer base. The purpose of providing the information in this format is to substitute the completion of a separate questionnaire for each financial institution for which State Street is a customer.

State Street's Global AML and Sanctions Compliance Program is routinely evaluated, updated and enhanced in order to reflect changes to State Street's business activities, as well as ensuring compliance with applicable supervisory standards and legal requirements. The Global AML and Sanctions Compliance Program is approved by State Street's Board of Directors on an annual basis. State Street cooperates fully with law enforcement and regulatory investigations and inquiries.

State Street's Global AML and Sanctions Compliance Program is designed to mitigate money laundering and sanctions risks in accordance with our risk profile, risk tolerance, and risk appetite. Therefore, our policies and procedures are not shared externally. There may be other types of information that State Street will not be able to provide due to regulatory or other restrictions. The content that is contained within this questionnaire should provide your institution with sufficient information related to our Global AML and Sanctions Compliance Program and associated policies and procedures.

Section 1: Entity and Ownership

1.1 This Questionnaire covers the following Legal Entities, collectively referred to throughout this document as “State Street”:

- **State Street Corporation, on behalf of itself, its subsidiaries, and its affiliates**
- **State Street Bank and Trust Company and its branches (domestic and foreign)**

State Street has a Global AML and Sanctions Compliance Program that is applicable to all State Street legal entities wherever it conducts business, and it includes specific jurisdictional regulatory requirements, where applicable.

1.2 Jurisdiction where the institution was formed/incorporated: **United States**

1.3 Physical business address of institution: **1 Congress Street, Boston, MA 02114**

1.4 State Street's Global AML and Sanctions Compliance Program is subject to supervisory examination by the Federal Reserve System and other authorities.

1.5 Bank Identifier Code:

- **State Street Bank and Trust Company: SBOSUS33**

1.6 Legal Entity Identifiers (LEIs):

- **State Street Corporation: 549300ZFEEJ2IP5VME73**
- **State Street Bank and Trust Company: 571474TGEMMWANRLN572**

1.7 Executive Leadership:

A list is currently available through the State Street public website:

<https://www.statestreet.com/us/en/individual/about/our-people/leaderships>

1.8 State Street's customers are primarily the following:

- regulated financial institutions
- registered mutual funds
- collective investment funds and other pooled investment vehicles
- corporate and public retirement plans
- insurance companies
- foundations
- endowments
- investment managers

1.9 State Street conducts business in various global jurisdictions, and has locations in the following countries and territories: Australia, Austria, Belgium, Brazil, Brunei Darussalam, Canada, Cayman Islands, Chile, Colombia, France, Germany, Hong Kong, India, Ireland, Italy, Japan, Jersey, Luxembourg, Malaysia, Mexico, Netherlands, People’s Republic of China, Poland, Saudi Arabia, Singapore, South Korea, Switzerland, Taiwan, Thailand, United Arab Emirates, United Kingdom and the United States.

Section 2: Products or Services Not Offered to Customers

#	Products or Services Not Offered to Customers
2a	State Street does not provide payable through accounts as a service to its customers.
2b	State Street does not provide nested accounts as a service to its customers.
2c	State Street does not offer anonymous accounts to its customers.
2d	State Street does not offer banknotes services to its customers.

Section 3: Sanctions

#	Question
3a	<p>State Street attests that it will not permit any business it conducts to go through, involve, or interact with your institution (unless State Street has a license or other legal permission to do so (see below)), if such business involves either:</p> <ul style="list-style-type: none"> • Parties in a Sanctioned Jurisdiction (which includes¹ certain regions of Ukraine², the Democratic People’s Republic of Korea (a/k/a North Korea), the Islamic Republic of Iran, the Republic of Cuba, and the Syrian Arab Republic); or

¹ The Sanctioned Jurisdictions listed could change over time.

² As of November 2022, this includes Donetsk People’s Republic, Luhansk People’s Republic (a/k/a the Donbas region), Kherson, Zaporizhzhya, and Crimea regions of Ukraine. These regions may change over time and are intended to include any disputed territory between Russia and Ukraine.

#	Question	
	<ul style="list-style-type: none"> Parties who are designated as sanctioned parties by the United States, European Union, United Nations, or the United Kingdom <p>State Street attests that it will not use a license to conduct otherwise prohibited business, unless:</p> <ul style="list-style-type: none"> State Street has provided the license to your institution; and State Street has received approval from your institution prior to involving your institution in such business. <p>State Street attests that it will promptly notify your institution if it becomes aware that it has breached this attestation.</p>	
3b	<p>State Street does not currently have nor currently expects to have any direct business dealings (such as conducting or facilitating transactions, investing in, opening, closing, or utilizing an account, or providing custodial, advisory, asset management, or other similar services, or have investors in) involving any of the following jurisdictions:</p> <ol style="list-style-type: none"> Certain regions of Ukraine Democratic People's Republic of Korea (a/k/a North Korea) Islamic Republic of Iran Republic of Cuba Syrian Arab Republic 	
3c	<p>Will or does State Street maintain omnibus accounts at institutions or will/is an omnibus account utilized to facilitate State Street's use of product(s) at institutions?</p> <p>An omnibus account is an account held at an institution for State Street to process transactions where the account is used, in whole or in part, to hold assets on behalf of State Street's customers.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3d	<p><u>Sanctions Attestation for Omnibus Accounts</u></p> <p>State Street attests it will not use omnibus accounts to knowingly transact or facilitate transactions, with, for, or on behalf of any individual or entity who:</p> <ol style="list-style-type: none"> Is based in a sanctioned jurisdiction (listed in question 3.2); Is designated as a sanctioned party by the United States, European Union, United Nations, or the United Kingdom; or Primarily does business in a sanctioned jurisdiction, as listed in 3b, or with a sanctioned party. 	<p>Check ALL boxes to complete the Attestation.</p> <p>a) <input checked="" type="checkbox"/></p> <p>b) <input checked="" type="checkbox"/></p> <p>c) <input checked="" type="checkbox"/></p>

Section 4: State Street's AML and Sanctions Compliance Program

#	AML and Sanctions Compliance Program	Yes/No
4a	Does State Street have an AML and Sanctions compliance program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4b	Does the jurisdiction where State Street was formed/incorporated adhere to the current Financial Action Task Force ("FATF") recommendations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4c	Does State Street's AML and Sanctions compliance program require approval of its Board of Directors or a senior committee thereof?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4d	Does State Street have a designated compliance officer with sufficient experience/expertise that is responsible for co-coordinating and overseeing the AML and Sanctions compliance program on a day-to-day basis, which has been approved by senior management?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4e	Has State Street developed written policies documenting the processes that are in place to prevent and detect suspicious transactions and to report suspicious transactions that have been approved for reporting by senior management?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4f	In addition to inspections by the government supervisors/regulators, does State Street have an internal audit function or other independent third party that assesses AML and Sanctions policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4g	Does State Street have a policy prohibiting 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.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4h	Does State Street have policies that assess the risks of relationships with politically exposed persons ("PEPs"), including their family members and close associates?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4i	Does State Street have appropriate record retention procedures pursuant to applicable laws?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4j	Does State Street provide transparency practices relating to operations for wire transfers (for instance, does State Street utilize MT 202 COV when utilizing the SWIFT messaging infrastructure for cover payments) and/or adhere to the Wolfsberg Group Payment Transparency Standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4k	Is State Street's AML and Sanctions Program applicable to its foreign branches and majority-owned subsidiaries?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
#	Risk Assessment	
4l	Does State Street's AML and Sanctions enterprise-wide risk assessment cover the inherent risk components below?	
4l1	Customer base	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4l2	Products and services	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4l3	Delivery channels	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4l4	Geography	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
#	Know Your Customer, Customer Due Diligence and Enhanced Due Diligence	

4m	Has State Street implemented processes for the identification and verification of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4n	Which of the following does State Street collect and retain when performing customer due diligence? Select all that apply. <input checked="" type="checkbox"/> Ownership structure <input checked="" type="checkbox"/> Customer identification <input checked="" type="checkbox"/> Expected activity <input checked="" type="checkbox"/> Nature of business/employment <input checked="" type="checkbox"/> Product usage <input checked="" type="checkbox"/> Purpose and nature of relationship <input checked="" type="checkbox"/> Source of funds <input checked="" type="checkbox"/> Source of wealth	
4o	Does State Street collect information and assess its financial institution customers' AML and Sanctions policies or practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4p	Does State Street have procedures to establish a record for each customer noting their respective identification documents and due diligence information collected at on-boarding?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4q	Does State Street determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that State Street has reason to believe pose a heightened risk of illicit activities at or through your institution?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
#	Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	
4r	Does State Street have policies, procedures, and processes to review and escalate matters arising from the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4s	Does State Street have regulatory requirements to report currency transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4s1	Does State Street have policies, procedures, and processes to comply with currency reporting requirements? State Street prohibits the acceptance of physical currency. Accordingly, there should be no currency transactions by, through or to State Street that would necessitate the filing of a currency transaction report. If State Street were to receive unsolicited physical currency in error from its customer, State Street may be required to follow technical regulatory requirements related to Currency Transaction Reporting.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4t	Does State Street screen customers and transactions against persons, entities or countries that are contained on lists issued by government/international bodies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4u	Does State Street have policies to reasonably ensure that it only operates with financial institutions that possess licenses to operate in their countries of origin?	<input checked="" type="checkbox"/> Yes

		<input type="checkbox"/> No
#	Transaction Monitoring	
4v	Does State Street have a transaction monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as traveler's checks, money orders, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
#	AML and Sanctions Training	
4w	Does State Street provide AML and Sanctions training to relevant employees, which includes the following: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving State Street's products and services; and • Internal policies to prevent money laundering? 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4x	Does State Street retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4y	Does State Street have policies to communicate new AML and Sanctions related laws or changes to existing AML and Sanctions related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4z	If State Street employs agents to carry out some of its functions, does State Street provide AML and Sanctions training to relevant agents that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving State Street's products and services, and internal policies to prevent money laundering?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

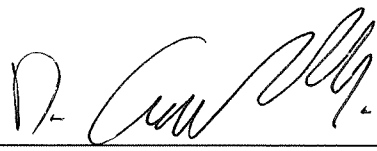
CERTIFICATION

On behalf of my institution, I/we hereby certify:

- To the best of my knowledge, the information provided in this questionnaire is complete, correct, and up to date.
- State Street is subject to AML/CTF regulations and our institution's customer due diligence procedures adhere to local regulatory requirements.
- State Street retains copies of the underlying customer identification and verification documents which will be maintained as required by the applicable laws and regulations. Upon request, State Street will make available the customer identification and verification documents.

Printed Name: **David J. Cracknell**

Title: **Global Chief AML Officer**

Signature: 

Date: July 16, 2024