the Wolfsberg Group

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| Financial Institution Name: | Vontobel Asset Management AG |
| Location (Country): | Switzerland |

| No # | Question | Answer |
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| **1. ENTITY & OWNERSHIP** | | |
| 1 | Full Legal name | Vontobel Asset Management AG |
| 2 | Append a list of foreign branches which are covered by this questionnaire | n/a |
| 3 | Full Legal (Registered) Address | Gotthardstrasse 43<br>8022 Zurich |
| 4 | Full Primary Business Address (if different from above) | Genferstrasse 27<br>8022 Zurich |
| 5 | Date of Entity incorporation/establishment | December 19, 2014 |
| 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 | VONN; the group holding company listed on SIX, VAMAG as such is not listed |
| 6 b | Member Owned/Mutual | No |
| 6 c | Government or State Owned by 25% or more | No |
| 6 d | Privately Owned | No |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | |
| 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 | |
| 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 | 549300FM29R281J1VG65 |
| **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 | No |
| 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? | No |
| 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 | Compliance and IT have been delegated to an affiliate, Bank Vontobel AG, a Swiss based bank regulated by FINMA. |
| 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 | Yes |
| 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 | Prohibited |
| 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 | EDD on risk-based approach |
| 30 e | Gambling customers | EDD on risk-based approach |
| 30 f | General Trading Companies | EDD on risk-based approach |
| 30 g | Marijuana-related Entities | EDD on risk-based approach |
| 30 h | MSB/MVTS customers | Do not have this category of customer or industry |
| 30 i | Non-account customers | EDD on risk-based approach |
| 30 j | Non-Government Organisations | EDD on risk-based approach |
| 30 k | Non-resident customers | EDD on risk-based approach |

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| 30 l | Nuclear power | EDD on risk-based approach |
| 30 m | Payment Service Providers | Do not have this category of customer or industry |
| 30 n | PEPs | Always subject to EDD |
| 30 o | PEP Close Associates | EDD on risk-based approach |
| 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 | Prohibited |
| 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 | Do not have this category of customer or industry |
| 30 w | Used Car Dealers | EDD on risk-based approach |
| 30 x | Virtual Asset Service Providers | Do not have this category of customer or industry |
| 30 y | Other (specify) | |
| 31 | If restricted, provide details of the restriction | |
| **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? | Automated |
| 33 a | If manual or combination selected, specify what type of transactions are monitored manually | |
| 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? | No |
| 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 | Federal Act of 10 October 1997 on Combating Money Laundering and Terrorist Financing in the Financial Sector (Anti-Money Laundering Act, AMLA) |
| 37 c | If N, explain | |
| **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 transacl |
| 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 transac |
| 41 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners and for filtering transac |
| 41 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transacl |
| 41 e | Lists maintained by other G7 member countries | Please select |
| 41 f | Other (specify) | Switzerland |
| 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) | No |
| **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)

Vontobel Asset Management AG
_____ (Financial Institution name)

I, Jürg Leu / Kaspar Böhni _____ (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.

Zurich, September 1, 2026

_____ (Signature & Date)

Dr. Jürg Leu