the Wolfsberg Group

Financial Institution Name: Location (Country): Savills Investment Management Global

No#	Question	Answer
	& OWNERSHIP	Allower
1	Full Legal name	
		Savills Investment Management LLP
2	Append a list of foreign branches which are	See the document attached
	covered by this questionnaire	dee the document attached
3	Full Legal (Registered) Address	33 Margaret Street, London, Greater London, W1G 0JD
4	Full Driman, Business Address (if different from	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
	Sale of Entity modification restablishment	24 December 2003 Trade register number OC306423
		Trade register framber 50000420
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	
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	Ultimate parent entities: Savills plc, listed London Stock Exchange under
	beneficial owners with a holding of 10 % of more	the ticker symbol SVS (reg. no. 02122174), at 71%, and Samsung Life Insurance Co., Ltd. listed Korea Exchange under the ticker symbol KRX:
		032830, at 29%. No natural persons ultimately holding more than 10% of
7	% of the Entity's total shares composed of bearer	the entity
ľ	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	Davids Barkhau - Vist. 12	
3	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	
1.	Land Logar Linky radiisation (LLI) ii dvalidatio	529900ZIX15M2S6ENK76
2. AML, C	TF & 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	W
	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

11		T		
Policies and Procedures Yes	11 g	Independent Testing	Yes	
11 I PEP Screening			Yes	
11 II Sanctions			Yes	
11 If M Sanctions Yes 11 m Training and Education Yes 11 n Training and Education Yes 12 is the Entity's ANL, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? Yes 13 Ose the Entity tour Board or equivalent Senior Management Committee? Yes 13 Oses the Entity that parties to carry out any components of its AML, CTF & Sanctions programme? Yes 13 a If Y, provide further details Dedicated KYC/AML tool is utilized to support the Risk Analysis. 14 Does the entity have a whistletilower policy? Yes 3 ANTI SRIBERY & CORRUPTION Yes 15 Its the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and compution? Yes 16 Oses the Entity provide mandatory ABC training to: Yes Yes 17 Oses the Entity provide mandatory ABC training to: Yes Yes 17 a Board and Senior Committee Management Yes 17 b 1st line of Defence Yes 17 d 3d till not of Defence Yes 17 d 3d till not of Defence Yes 17 d ord Line of Defence Yes	11 j	PEP Screening	Yes	
11 m	11 k	Risk Assessment	Yes	
11 n Training and Education Yes 12	11 I	Sanctions	Yes	
11 n Training and Education 12	11 m	Suspicious Activity Reporting	Yes	
Tensaction Mentioring Yes	11 n			
st the Entity's ANIL_CTF & Sanctions policy approved at least annually by the Board or equivalent Sancor Management Committee? 13 Does the Entity sus thing darties to carry out any components of its ANIL_CTF & Sanctions programme? 13 a If Y, provide further details Dedicated KYC/AML tool is utilized to support the Risk Analysis. 14 Does the entity have a whistlebilower policy? Yes Dedicated KYC/AML tool is utilized to support the Risk Analysis. 15 Base the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report tribbey and corruption? 16 Does the Entity incurrent audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to: 18 Ta Board and Senior Committee Management Yes Provided and and Senior Committee Management Yes 1st Line of Defence		~		
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Descrited KYCAMIL tool is utilized to support the Kisk Analysis.	13	components of its AML, CTF & Sanctions	Yes	
3. ANTI BRIBERY & CÓRRUPTION 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and responsibly prevent detect and requirements to reasonably prevent, detect and requirements to reasonably prevent, detect and report bribary and convergence of the procedures? 17 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? 17 a Board and Senior Committee Management Yes 17 b Ist Line of Defence Yes 17 c 2nd Line of Defence Yes 17 d 3rd 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 Not applicable Subject to ABC risk have been outsourced Contractors/consultants) 18 Non-employed workers as appropriate (contractors/consultants) 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 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unlicensed banks and for NBFIs 19 C Prohibit dealing with other entities that provide banking services to unlicensed banks and for NBFIs 19 C Prohibit dealing with other entities that provide banking services to unlicensed banks and for NBFIs 19 Prohibit topening and keeping of accounts for syot unlicensed banks and for NBFIs 19 Prohibit dealing with other entities that provide banking services to unlicensed banks and for NBFIs 19 Prohibit dealing with other entities that provide banking services to unlicensed banks and for NBFIs 19 Prohibit dealing with other entities that provides services to shell banks 19 Prohibit dealing with another Entity that provides services to shell banks 19 Prohibit opening and keeping of accounts for syot unlicensed banks and for	13 a	If Y, provide further details	Dedicated KYC/AML tool is utilized to support the Risk Analysis.	
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19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	10 d	<u> </u>		
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risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes		foreign PEPs, including their family and close	Yes	
sanctions, PEPs and Adverse Media/Negative Yes		risk issues/potentially suspicious activity identified	Yes	
	19 j	sanctions, PEPs and Adverse Media/Negative	Yes	

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 CI	L DD 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 24 h	Source of funds Source of wealth	Yes Yes	
24 n 25	Are each of the following identified:	100	
25 a	Ultimate beneficial ownership	Yes	
25 a1	Are ultimate beneficial owners verified?	Yes	
25 b	Authorised signatories (where applicable)	Yes	
25 с	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 29 a6	Trigger-based or perpetual monitoring reviews Other (please specify)	Yes 29 a4 for Singapore, outsourced CDD service provider has a 5 year frequency for low risk.	
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	EDD on risk-based approach	
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?	No	
30 c	Embassies/Consulates	EDD on risk-based approach	
30 d	Extractive industries	EDD on risk-based approach	
30 e	Gambling customers	EDD on risk-based approach	
30 f			
30 g	General Trading Companies	EDD on risk-based approach	
	Marijuana-related Entities	EDD on risk-based approach	
30 h	MSB/MVTS customers	EDD on risk-based approach	
30 i	Non-account customers	Do not have this category of customer or industry	
30 j	Non-Government Organisations	EDD on risk-based approach	
30 k	Non-resident customers	EDD on risk-based approach	
-	•		

30 I	Musiconnection	EDD delt beerdb
30 m	Nuclear power	EDD on risk-based approach
30 m	Payment Service Providers	EDD on risk-based approach
	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	EDD on risk-based approach
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	EDD on risk-based approach
30 x	Virtual Asset Service Providers	EDD on risk-based approach
30 y	Other (specify)	For the categories in section 30 an Exclusions Policy is in place. Therefore all KYC/CDD are subject to individual assessment and hence meet category "EDD on risk-based approach".
31	If restricted, provide details of the restriction	
6 MONIT	ORING & 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	Transactions, which are classified as High Risk KYC
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. PAYM	ENT 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	In jurisdictions in which the entity operates, it has policies and procedures to comply with applicable local and supranational rules and regulations.
37 c	If N, explain	
8. SANC	TIONS	
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

Does the Entity screen is customers, including beneficial owners in formation collected by the Entity, during inhoranting and regularly thereafter against Sanctions Lists and the Entity in its sanctions screening processes: 41 a Select the Sanctions Lists used by the Entity in its sanctions screening processes: 42 Consolidated United Nations Security Council Sanctions is used by the Entity in its sanctions screening processes: 43 b Consolidated United Nations Security Council Sanctions List (LIN) 44 b United States Department of the Treasury's Office of Financial Sanctions Integrenation HMT 45 c CREAT Consolidated List (EU) 46 European Union Consolidated List (EU) 47 c Lists maritained by the G7 member countries 47 d European Lists of Canada Consolidated List (EU) 48 European Lists of Canada Consolidated List (EU) 49 European Lists of Canada Consolidated Lists (EU) 40 European Lists of Canada Consolidated Lists (EU) 40 European Lists of Canada Consolidated Lists (EU) 41 European Lists of Canada Consolidated Lists (EU) 42 Cose the Entity have a physical presence, e.g. branches, subsidiatines, or representative offices located in countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated comprehensive privations against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against which UN, OFAC, OFSI, EU or G7 member countries have consolidated in Countries fraging against w				
sanctions screening processes. 4 a	40	beneficial ownership information collected by the Entity, during onboarding and regularly thereafter	Yes	
Section List (UN)	41			
of Foreign Assets Control (GPAC) 41 c	41 a		Used for screening customers and beneficial owners (i.e. reference data)	
(CPSI) 41 d European Union Consolidated List (EU) 42 Lists maintained by other G7 member countries 43 f C Lists maintained by other G7 member countries 44 c Lists maintained by other G7 member countries 45 Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OPAC, OPSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? 9. TRAINING & EDUCATION 43 Does the Entity provide mandatory training, which includes: 43 a loentification and reporting of transactions to government authorities and sanctions violations relevant for the types of products and services offered 43 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 43 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 43 c Internal policies for controlling money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 44 a Board and Senior Committee Management 44 a Board and Senior Committee Management 44 a Board and Senior Committee Management 44 c 2nd Line of Defence 45 c 2nd Line of Defence 46 d 3nd Line of Defence 47 c 2nd Line of Defence 48 d Non-employed workers (contractorisconsultants) 49 c 2nd Line of Defence 40 c 2nd Line of Defence 50 c 2nd Line of Defence 51 c 2nd Line of Defence 52 c 2nd Line of Defence 53 c 2nd Line of Defence 54 d Signature Page 46 Wolfsteeg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V12) 53 AVILLS INVESTMENT MANAGEMENT LLP 40 [Financial Institution name) 41 Laurence Greenblatt 42 c 2nd Line of Defence 43 c 2nd Line of Defence 44 c 3nd Line of Defence 45 c 3nd Line of Defence 46 c 3nd Line of Defence 47 c 47	41 b	·	Used for screening customers and beneficial owners (i.e. reference data)	
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Does the Entity provide mandatory training, which includes: 43 a Identification and reporting of transactions to government authorities 43 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered 43 c Internal policies for controlling money laundering, terrorist financing and sanctions violations 43 d New issues that occur in the market, e.g., significant regulatory actions or new regulations 44 a Standard Stand	42	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have	No	
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regulatory actions or new regulations 44	43 c		ering, Yes	
44 a Board and Senior Committee Management Yes	43 d		YAS	
44 b 1st Line of Defence Yes 44 c 2nd Line of Defence Yes 44 d 3rd Line of Defence Yes 44 d Third parties to which specific FCC activities have been outsourced been outsourced Not Applicable 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? Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) SAVILLS INVESTMENT MANAGEMENT LLP Laurence Greenblatt Global Head of Risk and Compliance [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. WWWWW GAWWHAT				
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44 d Third parties to which specific FCC activities have been outsourced 44 f Non-employed workers (contractors/consultants) 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? Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) SAVILLS INVESTMENT MANAGEMENT LLP (Financial Institution name) Laurence Greenblatt Global Head of Risk and Compliance I, Global Head of Risk and Compliance I, Global Head of Risk and Sanctions provided in this Wolfsberg FCCQ are complete and correct to my honest belief.				
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10. AUDIT 45	44 e	Third parties to which specific FCC activities have		
10. AUDIT 10.	44 f		Yes	
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? Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) SAVILLS INVESTMENT MANAGEMENT LLP Laurence Greenblatt Global Head of Risk and Compliance I, Global Head of Risk and Compliance Understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.	10. AUDIT		1	
Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) SAVILLS INVESTMENT MANAGEMENT LLP		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		
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(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.				
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	understood this			
30-May-2025				
		30-May-2025		

Appendix – Scope of the Wolfsberg Group Financial Crime Compliance Questionnaire

This Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) has been centrally prepared and applies uniformly to the following legal entities within the Savills Investment Management Group

Country	Official company name	Complete address	Banking Authority
United Kingdom	Savills Investment Management LLP	33 Margaret Street, London, W1G 0JD	Financial Conduct Authority (FCA)
United Kingdom	Savills Investment Management (UK) Limited	33 Margaret Street, London, W1G 0JD	Financial Conduct Authority (FCA)
Luxembourg	Savills Investment Management (Luxembourg) S.à r.l.	10, rue C.M. Spoo, L-2546 Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)
Italy	Savills Investment Management SGR S.p.A.	Via San Paolo 7, 20121 Milan	Commissione Nazionale per le Società e la Borsa (Consob) and Banca d'Italia
Germany	Savills Investment Management (Germany) GmbH	Sonnenstrasse 19, 80331 Munich	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)
Germany	Savills Investment Management (KVG) GmbH	Taunusanlage 18, 60325 Frankfurt am Main	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)
Germany	Savills Fund Management GmbH	Taunusanlage 18, 60325 Frankfurt am Main	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)
Singapore	Savills Investment Management Pte. Limited	30 Cecil Street, #20-05, Prudential Tower, Singapore 049712	Monetary Authority of Singapore (MAS)
Japan	Savills Investment Management Asia Limited	3F BPR Place Kamiyacho,1-11-9 Azabudai,Minato-Ku,Tokyo	Financial Services Agency (JFSA)
Australia	Savills Investment Management (Australia) Pty Limited	'The Gateway' Level 25, 1 Macquarie Place, Sydney NSW 2000	Australian Securities and Investments Commission (ASIC)