

The Dutch Central Bank (De Nederlandsche Bank N.V. or 'DNB') has issued the Policy on integrity in commercial real estate operations. As a financial institution regulated by the DNB, this policy requires banks to determine and assess the code of conduct of its clients, including their focus on integrity, in the context of mandatory enhanced customer due diligence.

Therefore, we kindly ask you to complete the questionnaire and provide additional information, duly sign and return this questionnaire together with any supplementary explanation.

Please note that based on your feedback additional follow up questions may be asked.

Company details

Company name (Full legal name)

To be filled in by the company's legal representative¹

Residence (Country and place of residence)

To be filled in by the company's legal representative

Other entities within your organisation to which these answers apply and which are customers of the bank

Please fill Appendix A for all other entities for which this form is applicable

The company and its employees

1. What does your company do to check, safeguard and promote the integrity of the employees, senior management, company directors and, if applicable, Supervisory Board members?

When answering, please consider (for example) the following measures:

- What checks does your organization perform when hiring new staff? Describe these checks.
- Does your organization have a Code of Conduct?
- Does your organization have a procedure that describes the measures to promote and monitor integrity?

Answer:

¹ Legal representatives are persons who can legally engage an entity or private individual and who are legally authorised either by statutory provision, articles of incorporation or by relevant law (e.g. company directors).

2. Has your company or any of its senior management, company directors, any Supervisory Board members or major shareholder (> 25%) been exposed to the local or Dutch (regulatory and/or law enforcement² authorities in relation to a possible breach of integrity³ over the past five years?

Yes No

If **yes**, please state under 'Answer':

- whether the breach was related to a person, the company, or both and state the number of people concerned, their names, their (management) positions and the nature of the breach.
- whether the breach has resulted in formal measures taken by your company. If so, please provide a high-level overview of these measures and whether these have been remedied.

Answer:

3. Did your company face one or more integrity incidents⁴ over the past 5 years?⁴

Yes No

If **yes**, please state under 'Answer' what this integrity incident consisted of and which measures were taken.

Answer:

4. Heeft uw instelling een procedure voor het vastleggen van gegevens van transacties en commerciële relaties, inclusief bijbehorende documenten? Wordt deze procedure toegepast?

Yes No

If **no**, please state under 'Answer' why such procedure for recording, or not recording in general, is not in place.

If **yes**, please explain the procedure under 'Answer'.

Answer:

² Such as Financial Regulator, the Public Prosecutor, the Fiscal Information and Investigation Service, the Tax or Customs Administration or any other state authority.

³ A fine that has been imposed or settled with the authorities could be classified as 'breach of integrity'.

⁴ Matters such as (including, but not limited to) fraud, bribery, conflicts of interest, pricing agreements, unrealistic valuations qualify as integrity incidents.

5. **A. Does your company comply with applicable laws and regulations?**

Yes No

If **no**, please clarify under 'Answer'.

B. If applicable: Has your licence for conducting your business been refused or withdrawn over the past 5 years?

Yes No

If **yes**, please clarify under 'Answer'.

Answer:

6. **Does your company have an internal officer or department⁵ charged with recording of data and monitoring compliance to local regulations and supervising your company's integrity and professionalism?**

Yes No

If **yes**, please explain the procedure under 'Answer'.

Answer:

7. **A. Does your company apply the four-eyes principle, i.e. are documents that legally bind your company signed by two persons with approval authority?**

Yes No

If **no**, please state under 'Answer' why this is not being performed.

B. Does your company always check whether invoices, either received or sent out, include a precise and correct description of the related service or product, that is in line with your company's invoice policy?

Yes No

If **no**, please state under 'Answer' why this is not being performed.

Answer:

⁵ For example: compliance, risk manager, auditor, etc.

8. A. What is the main purpose of the real estate portfolio of your company?

Please check all options, which are applicable for your company.

Realize capital growth by selling the real estate objects/ portfolio after appreciation,

Realize capital growth by buying real estate objects with the purpose of selling these real estate objects after remodelling and renovation,

Realize regular income stream from rental income whereby the real estate objects are held for the long term (>5 years),

Other:

Clarify under 'Answer' as needed.

B. Please provide a brief summary under 'Answer' on the composition of your real estate portfolio, focussing on location and types of properties of your companies' real estate assets.

If this information has previously been provided as part of the credit application, please refer to relevant documents.

Answer:

Third Parties⁶

9. Has an external accountant/ auditor expressed an opinion of the financial statements of your company over the past 3 years?

Yes No

If **yes**, what type of opinion has been given?

unqualified opinion (independent auditor's judgment that a company's financial statements are fairly and appropriately presented, without any identified exceptions, and in compliance with generally accepted accounting principles (GAAP).)

qualified opinion (the auditor has determined there is a material issue regarding accounting policies; he/she has insufficient information to verify certain aspects of the transactions and reports being audited)

adverse opinion (the auditor believes that the financial statements do not accurately represent the company's financial position)

disclaimer of opinion (auditor cannot issue an opinion on the financial statements because something has prevented him/her from gathering enough information)

other:

⁶ Third parties refer to parties such as but not limited to buyers/ purchasers, investors, tenants, vendors, suppliers, notaries, appraisers/ valuers, accountants, real estate agents, lawyers, environmental agencies, contractors, sub-contractors, architects, intermediaries, asset managers, etc.

Unless unqualified opinion has been given, please clarify under 'Answer' why qualified/ adverse/ disclaimer or other opinion has been given.

Answer:

10. Please explain which measures your company has taken to gain an understanding of the integrity and reputation of third parties

If not applicable, please indicate under 'Answer' why.

Answer:

Payments and Transactions

11. Does your company's entire payments traffic resulting from commercial real estate transactions go through a financial institution based in the jurisdiction in which the company is registered or, directly or otherwise, through a notary?

Yes No

If **no**, please specify under 'Answer' the financial institutions or parties, together with their country of registration, through which payment transactions are settled.

Answer:

12. Does your company allow real estate-related payments in cash and/or virtual assets⁷?

Yes No

If **yes**, please specify under 'Answer' the type of transactions involved, the reason(s) why and the percentage of the total (receipts/payments) that are settled in cash and/or virtual assets?

Answer:

⁷ The term "virtual asset" refers to any digital representation of value that can be digitally traded, transferred or used for payment (e.g. blockchain, bitcoin, crypto assets, virtual currencies).

13. Which measures does your company take to investigate and follow up on potential unusual commercial real estate transactions⁸?

If not applicable, please indicate under 'Answer' why.

Answer:

Sign-off

Ondergetekende verklaart dat de gegevens in dit formulier en eventuele bijlagen naar waarheid zijn verstrekt.

Name of authorised signatory
(First name and surname)

Date (dd-mm-yyyy)

Signature

Name of authorised signatory
(First name and surname)

Date (dd-mm-yyyy)

Signature

⁸ An unusual transaction is for instance a purchase or sale transaction with an above or below average value difference compared to the market value. An ABC transaction is referred to when real estate is sold - at least - twice within a period of no more than 12 months.

Appendix A

Please add below all entities for which this questionnaire is applicable. In case of different signatories, please include sign-off per entity.

Entity 1

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 2

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 3

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 4

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 5

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 6

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 7

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 8

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 9

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 10

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 11

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature

Entity 12

Company name
(Volledige juridische tenaamstelling)

Residence
(Country and place of residence)

Name of legal representative

Date (dd-mm-yyyy)

Signature
