the Wolfsberg Group

Financial Institution Name: SoFi Technologies, Inc.
Location (Country) : Global

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	SoFi Technologies, Inc.
2	Append a list of foreign branches which are covered by this	
3	Full Legal (Registered) Address	251 Little Falls Drive, Wilmington, Delaware 19808
4	Full Primary Business Address (if different from above)	234 1st St, San Francisco, California 94105
5	Date of Entity incorporation/establishment	28-May-21
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	NASDAQ-"SOFI"
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	N/A
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	No
8 a	If Y, provide the name of the relevant branch/es which operate	N/A
9	Does the Bank have a Virtual Bank License or provide services only	No
10	Provide Legal Entity Identifier (LEI) if available	N/A
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes
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	Yes
13	Does the Entity use third parties to carry out any components of its	Yes
13 a	If Y, provide further details	Certain customer list management screening and certain automated transaction
14	Does the entity have a whistleblower policy?	Yes
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with	Yes
16	Does the Entity's internal audit function or other independent third	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	Not Applicable
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	
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	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks	Yes
19 c	Prohibit dealing with other entities that provide banking services to	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell	Yes
19 f	Prohibit opening and keeping of accounts for Section 311	Yes
19 g	Prohibit opening and keeping of accounts for any of	Yes
19 h	Assess the risks of relationships with domestic and foreign PEPs,	Yes
19 i	Define the process for escalating financial crime risk	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and	Yes
20	Has the Entity defined a risk tolerance statement or similar	Yes
21	Does the Entity have record retention procedures that comply with	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	Yes
24	Which of the following does the Entity gather and retain when	
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	Yes
27	Does the Entity have a risk based approach to screening customers	Yes
28	Does the Entity have policies, procedures and processes to review	Yes
29	Is KYC renewed at defined frequencies based on risk rating	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
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	
30 a	Arms, Defence, Military	Do not have this category of customer or industry
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	No
30 c	Embassies/Consulates	Do not have this category of customer or industry
30 d	Extractive industries	Do not have this category of customer or industry
30 e	Gambling customers	Do not have this category of customer or industry
30 f	General Trading Companies	Do not have this category of customer or industry
30 g	Marijuana-related Entities	Prohibited
30 h	MSB/MVTS customers	EDD on a risk based approach
30 i	Non-account customers	Prohibited
30 j	Non-Government Organisations	EDD on a risk based approach
30 k	Non-resident customers	No EDD/restriction or prohibition
30 l	Nuclear power	Do not have this category of customer or industry
30 m	Payment Service Providers	EDD on a risk based approach
30 n	PEPs	EDD on a risk based approach
30 o	PEP Close Associates	EDD on a risk based approach
30 p	PEP Related	EDD on a risk based approach
30 q	Precious metals and stones	Do not have this category of customer or industry
30 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
30 s	Regulated charities	EDD on a risk based approach
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	Do not have this category of customer or industry
30 v	Unregulated charities	EDD on a risk based approach
30 w	Used Car Dealers	EDD on a risk based approach
30 x	Virtual Asset Service Providers	EDD on a risk based approach
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	Yes
33	What is the method used by the Entity to monitor transactions for	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions	Credit Card, Lending, Commercial Payment Services
34	Does the Entity have regulatory requirements to report suspicious	Yes
34 a	If Y, does the Entity have policies, procedures and processes to	Yes
35	Does the Entity have policies, procedures and processes to review	Yes
7. PAYMENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment	Yes
37	Does the Entity have policies, procedures and processes to comply	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, Specify the regulation	SoFi maintains policies and procedures to comply with applicable regulations in the
37 c	If N, explain	
8. SANCTIONS		
38	Does the Entity have a Sanctions Policy approved by management	Yes
39	Does the Entity have policies, procedures or other controls	Yes
40	Does the Entity screen its customers, including beneficial ownership	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
41 b	United States Department of the Treasury's Office of Foreign Assets	Used for screening customers and beneficial owners and for filtering transactional data
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)

41 f	Other (specify)	
42	Does the Entity have a physical presence, e.g. branches,	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	Yes
43 c	Internal policies for controlling money laundering, terrorist financing	Yes
43 d	New issues that occur in the market, e.g. significant regulatory	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,	Yes

Signature Page

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

SoFi Technologies, Inc.

I, **David Bohm** Enterprise Chief Compliance Officer and Chief BSA/AML and Sanctions 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.

David Bohm

05/07/2026