## the Wolfsberg Group

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

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	SoFi Technologies, Inc. This questionnaire applies to SoFi Technologies, Inc. and each of its majority owned subsidiaries (collectively, "SoFi")
2	Append a list of foreign branches which are covered by this questionnaire	
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 with a holding of 10% or more	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 Banking License (OBL) ?	No V
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
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	
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 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	<b>■</b>
11 i         Policies and Procedures         Yes           11 j         PEP Screening         Yes           11 k         Risk Assessment         Yes	
11 j PEP Screening Yes 11 k Risk Assessment Yes	
11 k Risk Assessment Yes	
	_
111 Sanctions Yes	<u> </u>
11 m Suspicious Activity Reporting Yes	<b>V</b>
11 n Training and Education Yes	
11 o Transaction Monitoring Yes	▼
Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?  Yes	•
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  Certain customer list management screening an transaction monitoring is supported by leveragin services. However, those activities are subject to assurance reviews in addition to the quality continuous firms.	ng third-party managed o significant ongoing quality
14 Does the entity have a whistleblower policy? Yes	
3. ANTI BRIBERY & CORRUPTION	
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	
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	V
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 Not applicable	▼
17 f Non-employed workers as appropriate (contractors/consultants)  Yes	<b>~</b>
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES	
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	V
18 b Terrorist financing Yes	
18 c Sanctions violations Yes	V
19 Does the Entity have policies and procedures that:	
Prohibit the opening and keeping of anonymous and fictitious named accounts	▼
Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Yes	<b>V</b>
19 c Prohibit dealing with other entities that provide banking services to unlicensed banks	•
19 d Prohibit accounts/relationships with shell banks Yes	
19 e Prohibit dealing with another Entity that provides services to shell banks	<b>V</b>
19 f Prohibit opening and keeping of accounts for Section 311 designated entities Yes	▼
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	<b>V</b>
19 h  Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  Yes	<b>-</b>
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	

smiler document which defines a risk boundary around their business?  21 a Does the Entity have record referencing procedures that comply with applicable leve?  22 a Does the Entity wriffy the identity of the customer?  23 Do the Entity spotloise and procedures set out when CDD must be completed, e.g. at the time of comboarding or within 30 days?  24 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:  24 Description of the following does the Entity gather and retain when conducting CDD? Select all that apply:  24 Description of the following does the Entity gather and retain when conducting CDD? Select all that apply:  24 Description of the following does the Entity gather and retain when conducting CDD? Select all that apply:  24 Description of posteroses/employment  25 Proceedings of the Select all that apply:  24 Propose and natura of relationship  25 Procedure of funds  26 Propose and natura of relationship  26 Propose and natura of relationship  27 Propose and natura of relationship  28 Description of funds  28 Description of funds  29 Description of funds  20 Description of funds  20 Description of funds  20 Description of				
that comoly with applicable lowe?  If y, what is the retention period?  S, KYC, CDD and EDD  Does the Entity verify the identity of the customer?  Do the Entity spoilcies and procedures set out when CDD but to completed e.g. at the time of CDD and to complete e.g. at the c	20	similar document which defines a risk boundary	Yes	•
\$ years or more    Section   Section	21		Yes	•
Does the Entity verify the identity of the customer?    Ves	21 a	If Y, what is the retention period?	5 years or more	•
Does the Entity verify the identity of the customer?    Ves	5 KYC C	DD and EDD		
Do the Entity's policies and procedures set out when ODD must be completed on a sit the time of orboarding or within 30 days?  Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: retain the selection of the selec			Yes	
Which of the Tolkowing does the Entity gather and retain when conducting or within 30 days?  Which of the Tolkowing does the Entity gather and retain when conducting CDD? Select all that apply:  24 a Customer identification Yes			103	〓
retain when conducting CDD? select all that apply:  24 a	23	CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	•
24 b Expected activity	24			
24 d Ownership structure Yes	24 a	Customer identification	Yes	
24 d Product usage Yes   24 e Product usage Yes   24 f Product usage Yes   24 g Source of funds Yes   25 a Ultimate beneficial ownership   25 a Are each of the following identified:   25 a Ultimate beneficial ownership   25 a Vare of wealth   25 a Vare of funds   26	24 b	Expected activity	Yes	
24 f Product usage 24 f Purpose and nature of relationship 24 g Source of funds 25 Are each of the following identified: 25 Are each of the following identified: 25 a C Rey controllers 25 d Authorised signatories (where applicable) 25 a C Rey controllers 26 c Rey controllers 27 Does the detilipence process result in customers receiving a risk classification? 27 Does the detilipence process result in customers receiving a risk classification? 27 Does the Entity have a risk based approach to steeping authorise and connected parties to determine whether they are PEPs, or controlled by PEPs? 28 Does the Entity have a risk based approach to steeping customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 29 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? 29 Is KYC renewed at defined frequencies based on risk rating (Periodic Nerviews)? 29 a 1 Less than one year 29 a 2 1 - 2 years 30 3 - 4 years 30 4 Yes 30 5 Yes 30 6 Form the list below, which categories of customers or industries are subject to EDD assessment contain the elements as set out in the worldship of the Entity's EDC or programme? 30 b Respondent Banks 30 b Respondent Banks 30 c Embassies/Consulates 30 c Embassies/Consulates 30 d Embassies/Consulates 30 f MSBMVTS customers 30 f MSBMVTS customers 30 f MSBMVTS customers 30 j Mon-account customers 40 Forbiblied 50 on nisk-based approach 50 forbiblied	24 c	Nature of business/employment	Yes	V
24 fg Source of funds Yes	24 d	Ownership structure	Yes	
24 fg Source of funds Yes	24 e	·		V
24 g Source of funds  Source of wealth Yes  Are each of the following identified:  25 a Utilimate beneficial ownership Yes  25 at Are utilimate beneficial owners verified? Yes  25 b Authorised signatories (where applicable) Yes  25 c Key controllers Cobes the Key controllers receiving a risk classification?  26 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  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?  29 Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  29 a If Iyes, select all that apply: 29 a 1 Iyes, select all that apply: 29 a 2 I 1-2 years Yes  29 a 3 3 -4 years Yes  29 a 4 Syears or more 29 a 3 5 years or more 29 a 4 Syears or more 30 Arms, Defence, Military 30 From the list below, which categories of customers or industries are subject to EDD a risk-based approach  Trigger-based or perpetual monitoring reviews Other (please specify)  30 Arms, Defence, Military 30 B Respondent Banks Do not have this category of customer or industry 30 C Embassies/Consulates 30 B Embassies/Consulates 30 C Embassies/Consulates 30 C Gambling customers 30 G General Trading Companies Do not have this category of customer or industry 30 G Gambling customers Do not have this category of customer or industry 30 G Gambling customers Do not have this category of customer or industry 30 G Gambling customers Do not have this category of customer or industry 30 G Marijanan-related Entities Pohibited Prohibited P		-		V
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30 b Respondent Banks  30 b1 If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  30 c Embassies/Consulates  30 d Extractive industries  30 e Gambling customers  30 f General Trading Companies  30 g Marijuana-related Entities  30 h MSB/MVTS customers  30 i Non-account customers  30 j Non-Government Organisations  Do not have this category of customer or industry  20 not have this category of customer or industry  21 customer or industry  22 customer or industry  23 customer or industry  24 customer or industry  25 customer or industry  26 customer or industry  27 customer or industry  28 customer or industry  29 customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  26 customer or industry  27 customer or industry  28 customer or industry  29 customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  29 customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  21 customer or industry  22 customer or industry  23 customer or industry  24 customer or industry  25 customer or industry  26 customer or industry  27 customer or industry  28 customer or industry  29 customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  29 customer or industry  20 not have this category of customer or industry  20 not have this category of customer or industry  29 customer or industry  20 customer or industry  20 customer or industry	30	industries are subject to EDD and/or are restricted, or		
30 b Respondent Banks  10 b No not have this category of customer or industry  11 f EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  12 c Embassies/Consulates  13 d Extractive industries  14 Do not have this category of customer or industry  15 Do not have this category of customer or industry  16 Extractive industries  17 Do not have this category of customer or industry  17 Do not have this category of customer or industry  18 General Trading Companies  19 Do not have this category of customer or industry  10 Do not have this category of customer or industry  17 Do not have this category of customer or industry  18 General Trading Companies  19 Do not have this category of customer or industry  10 Do not	30 a	Arms, Defence, Military	Do not have this category of customer or industry	
If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  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 risk-based approach 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 b	Respondent Banks		
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 risk-based approach 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 b1	assessment contain the elements as set out in the		•
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 risk-based approach 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 с	Embassies/Consulates	Do not have this category of customer or industry	V
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 risk-based approach 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach	30 d			V
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 risk-based approach 30 i Non-account customers Prohibited 30 j Non-Government Organisations EDD on risk-based approach				
30 g Marijuana-related Entities Prohibited  30 h MSB/MVTS customers EDD on risk-based approach  30 i Non-account customers Prohibited  30 j Non-Government Organisations EDD on risk-based approach		<u> </u>		
30 h MSB/MVTS customers EDD on risk-based approach  30 i Non-account customers Prohibited  30 j Non-Government Organisations EDD on risk-based approach				
30 i Non-account customers Prohibited  30 j Non-Government Organisations EDD on risk-based approach		Marijuana-related Entities	Prohibited	$\blacksquare$
30 j Non-Government Organisations EDD on risk-based approach	30 h	MSB/MVTS customers	EDD on risk-based approach	
30 j Non-Government Organisations EDD on risk-based approach	30 i	Non-account customers		
	30 i			
	30 k	Non-resident customers	No EDD/restriction or prohibition	

30 I	Nuclear	Do not have this not account outlands and indicates	
30 m	Nuclear power	Do not have this category of customer or industry	_
30 m	Payment Service Providers	Do not have this category of customer or industry	
	PEPs	EDD on risk-based approach	
30 o	PEP Close Associates	EDD on risk-based approach	
30 p	PEP Related	EDD on 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	<b>V</b>
30 s	Regulated charities	EDD on risk-based approach	
30 t	Shell banks	Prohibited	lacksquare
30 u	Travel and Tour Companies	Do not have this category of customer or industry	
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	Do not have this category of customer or industry	lacksquare
30 y	Other (specify)		
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?	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	<b>V</b>
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	<b>~</b>
7. PAYMI	ENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	_
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	SoFi maintains policies and procedures to comply with applicable	
		regulations in the jurisdiction it operates.	
37 с	If N, explain		
8. SANCT	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	•

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			
41 a	sanctions screening processes:  Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering tran		
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 trar		
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering tran		
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering trar		
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering trans		
41 f	Other (specify)			
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 V		
9. TRAININ	IG & 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 44 d	2nd Line of Defence	Yes 🔽		
44 e	3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes Yes		
44 f	Non-employed workers (contractors/consultants)	Yes		
10. AUDIT	Non-employed workers (contractors/consultants)	res		
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)				
SoFi Technologies, Inc. (Financial Institution name)				
Joshua Blazer (Senior Compliance Manager- Second Line representative) certify that I have read and				
I, Joshua Blazer (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.				
Joshua Blazer June 16,2025 (Signature & Date)				