



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
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, 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	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 annually by the Board or equivalent Senior Management Committee?	Yes	☐
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	Certain customer list management screening and certain automated transaction monitoring is supported by leveraging third-party managed services. However, those activities are subject to significant ongoing quality assurance reviews in addition to the quality control reviews required by those firms.	
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	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 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	☐

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	v
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	v
21 a	If Y, what is the retention period?	5 years or more	v
5. KYC, CDD and EDD			
22	Does the Entity verify the identity of the customer?	Yes	v
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	v
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	v
24 b	Expected activity	Yes	v
24 c	Nature of business/employment	Yes	v
24 d	Ownership structure	Yes	v
24 e	Product usage	Yes	v
24 f	Purpose and nature of relationship	Yes	v
24 g	Source of funds	Yes	v
24 h	Source of wealth	Yes	v
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	v
25 a1	Are ultimate beneficial owners verified?	Yes	v
25 b	Authorised signatories (where applicable)	Yes	v
25 c	Key controllers	Yes	v
25 d	Other relevant parties	Yes	v
26	Does the due diligence process result in customers receiving a risk classification?	Yes	v
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	v
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	v
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	v
29 a	If yes, select all that apply:		
29 a1	Less than one year	Yes	v
29 a2	1 – 2 years	Yes	v
29 a3	3 – 4 years	Yes	v
29 a4	5 years or more	Yes	v
29 a5	Trigger-based or perpetual monitoring reviews	Yes	v
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	Do not have this category of customer or industry	v
30 b	Respondent Banks	Do not have this category of customer or industry	v
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	v
30 c	Embassies/Consulates	Do not have this category of customer or industry	v
30 d	Extractive industries	Do not have this category of customer or industry	v
30 e	Gambling customers	Do not have this category of customer or industry	v
30 f	General Trading Companies	Do not have this category of customer or industry	v
30 g	Marijuana-related Entities	Prohibited	v
30 h	MSB/MVTS customers	EDD on risk-based approach	v
30 i	Non-account customers	Prohibited	v
30 j	Non-Government Organisations	EDD on risk-based approach	v
30 k	Non-resident customers	No EDD/restriction or prohibition	v

30 l	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	
30 n	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	
30 s	Regulated charities	EDD on 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 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	
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 regulatory 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?	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 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	

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	v
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 transactions	v
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 transactions	v
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactions	v
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactions	v
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactions	v
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. TRAINING & EDUCATION			
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	v
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	v
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	v
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	v
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	v
44 b	1st Line of Defence	Yes	v
44 c	2nd Line of Defence	Yes	v
44 d	3rd Line of Defence	Yes	v
44 e	Third parties to which specific FCC activities have been outsourced	Yes	v
44 f	Non-employed workers (contractors/consultants)	Yes	v
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	v
Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) SoFi Technologies, Inc. _____ (Financial Institution name) I, <u>Joshua Blazer</u> _____ (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.  June 16, 2025 _____ (Signature & Date)			