

Policy on Prevention of Money Laundering and Terrorist Financing

Document purpose and scope

The Policy sets out how the Bank fulfils its obligations regarding the prevention of money laundering and terrorist financing (AML/CTF) to ensure compliance with legal requirements.

Which ESG-related issues does the Policy address?

The Bank applies due diligence measures to its customers. It verifies the identity of beneficial owners, determines the purpose and nature of business relationships, and conducts ongoing customer monitoring. If the Bank determines that the risk of money laundering or terrorist financing is unacceptable, it will decline to enter into a relationship with the customer or the transaction. If there is a suspicion that a transaction or asset may be linked to money laundering or terrorist financing, the Bank is obligated to notify the General Inspector of Financial Information (GIIF).

The Bank assesses the risk of money laundering and terrorist financing associated with products and services before they are launched or significantly modified. Using appropriate metrics, it monitors whether established risk thresholds relating to individual business processes have been exceeded. The Bank regularly trains its employees and other persons performing duties related to anti-money laundering and counter-terrorist financing. The process for anonymously reporting actual or potential breaches includes protecting whistleblowers from retaliatory actions or unfair treatment.

The Policy is complemented by procedures and other internal regulations devoted to anti-money laundering and counter-terrorist financing in the context of individual customer categories, relationships, and controls.

The highest management level responsible for the Policy

The Policy defines the responsibilities of individual organisational units forming part of one of the three lines of defence, in accordance with the Bank's risk management framework. The Management Board is responsible for implementing the Policy, as well as for periodic reporting to the Supervisory Board. The Supervisory Board is responsible for overseeing and monitoring the implementation of the AML/CTF management framework.

Application across the Bank's subsidiaries

The Bank's subsidiaries that are classified as obliged institutions develop their own policies in accordance with the principle of proportionality. The subsidiaries are also subject to the Bank's direct supervision in the area of AML/CTF.