

Eurobank AML / CTF Policy Statement

Introduction

Money Laundering (ML) and Terrorist Financing (TF) activities are threats against the integrity and stability of the international financial system that may cause significant economic losses and reputational damages for Eurobank.

Eurobank has responsibility towards its Customers, shareholders and authorities to conduct business in a lawful and ethical way.

Purpose

The Anti-money laundering/ combating the financing of terrorism and Sanctions Policy (the Policy) assists Eurobank Staff in achieving the following objectives:

- ✓ Maintaining the integrity, credibility and reputation of Eurobank;
- ✓ Implementing internationally accepted best practices;
- ✓ Implementing and complying with all the legal and regulatory requirements that govern the operations of Eurobank;
- ✓ Ensuring that Eurobank's business, channels, products and services shall not be used, intentionally or unintentionally, to facilitate ML and/or TF;
- ✓ Ensuring that Sanctions measures and controls assist in applying effectively applicable regulation;
- ✓ Ensuring that adequate processes, systems and controls are in place, up to date and fit for purpose, in order to detect, prevent and deter any activities related to ML/ TF and Sanctions violations.

The requirements set forth in the Policy apply to Eurobank, including all Staff, all functions and all units, as well as third parties who are given access to Eurobank's information and premises.

The Policy is reviewed by Group Compliance, annually, or earlier, as necessary.

Eurobank's Approach

Eurobank's AML/CFT and Sanctions Control Framework has two main components:

- ✓ AML/CFT and Sanctions Program and
- ✓ Eurobank Governance and Control Framework.

Eurobank's AML/CFT and Sanctions Control Framework includes policies, guidelines (please refer to Appendix) for conducting business activity consistent with legal and regulatory requirements and the AML Compliance Risk Appetite. AML/CFT and Sanctions Governance Structure on the other hand, determines Roles and Responsibilities of Staff members that are allocated among the Three Lines of Defense, including the role and responsibilities of the Money Laundering Reporting Officer (MLRO) and Group MLRO, together with ongoing training necessary to support effective execution of their roles and responsibilities.

Key controls include:

- ✓ AML/CFT and Sanctions Program management and monitoring of its execution;

- ✓ AML/CFT and Sanctions Risk Assessments: analyzing and evaluating risks and the effectiveness of mitigating controls across Eurobank and for specific products/services offered;
- ✓ Compliance Monitoring that refers to the quality assurance and tests to ensure that operations across Eurobank meet the regulatory and internal expectations;
- ✓ AML/CFT and Sanctions governance committees and audit function to test the compliance program and control effectiveness.

Risk Assessment and Management

Eurobank applies a Risk Based Approach (RBA) when assessing the exposure to ML/TF or Sanctions risk. Controls must be appropriate to the level of risk and must be designed to prevent or identify non-compliance.

The AML Compliance Risk Appetite Statement sets forth the tolerable level of ML/TF risk that Eurobank Group is prepared to take while pursuing its strategic goals. With the AML/CFT and Sanctions Risk Assessment Eurobank ensures the adequate identification, assessment, management and monitoring of ML/TF and Sanctions risk across all business activities. Eurobank also assesses the ML/TF and Sanctions risk of new Products and Services in accordance with the relevant policies and procedures.

AML/CFT and Sanctions

Eurobank AML/CFT and Sanctions Program sets forth measures and controls that Eurobank follows to prevent and detect Money Laundering, Terrorism Financing and Sanctions breaches. The key elements of the Program are executed throughout the Business Relationship/ Customer cycle, as follows:

- ✓ Customer Acceptance, Customer Risk Assessment and Rating (CRA&R), Know Your Customer Profiling (KYC Profile) at Onboarding and during Lifecycle as ongoing Customer Due Diligence (CDD);
- ✓ Transaction Activity Monitoring and Reporting;
- ✓ Exiting Customer Business Relationship and Preventing Re-entry.

Eurobank Governance and Control Framework, Staff, Training

Eurobank Governance and Control Framework, includes all the relevant documents that establish the requirements and implementation processes for conducting business consistent with legal and regulatory and internal requirements (Group AML/CFT and Sanctions Policy, Guidelines, AML Compliance Risk Appetite Statement, Eurobank Entities' Policies and Procedures). There is also an AML/CFT and Sanctions Governance Structure, that determines Roles and Responsibilities that are allocated among the Three Lines of Defense, including the role and responsibilities of the Money Laundering Reporting Officer (MLRO) and Group MLRO. Staff is commensurate with Eurobank's overall AML/CFT risk profile, the ML/TF risks associated with the products and services that Eurobank offers, the markets and customer segments Eurobank serves, its entities and geographic locations. Enhanced emphasis is given to the ongoing training parameter as training is necessary to support Staff in effective execution of their roles and responsibilities.

Roles and responsibilities

- ✓ Board of Directors (BoD) have the overall and ultimate responsibility for Eurobank to have in place an appropriate control framework for AML/CFT and Sanctions compliance;
- ✓ Executive Board (EXBO) are responsible for ensuring that appropriate and adequate resources, internal procedures and systems are in place;

- ✓ Executive Board (EXBO) and Senior Management are jointly responsible for ensuring that a strong AML/CFT and Sanctions compliance culture is promoted at all levels throughout Eurobank;
- ✓ Eurobank implements the elements of the “Three lines of defense model” to AML/CFT and Sanctions activities, to ensure that AML/CFT and Sanctions Program is applied consistently and supervised appropriately.

Appendix

Eurobank's Statements/ Guidelines / Policies / Procedures AML/CFT

1	139 Background of Money Laundering, Terrorist Financing and Sanctions
2	141 Sanctions Guidelines
3	142 Transaction Monitoring Guideline
4	143 Reporting internally Suspicious Activity Guideline
5	144 Customer Risk Assessment and Rating Guideline
6	145 Customer Acceptance Guideline
7	146 Customer Identification and Verification (ID&V) Requirements Guideline
8	147 Customer Lifecycle Management Guideline
9	148 Ultimate Beneficial Ownership (UBO) Guideline
10	149 Source of Funds (SoF) and Source of Wealth (SoW) Guideline
11	150 Bearer Shares Guideline
12	151 Politically Exposed Persons (PEPs) Guideline
13	152 AML Compliance Risk Appetite Statement
14	153 Exiting Customer Business Relationships (De-risking)
15	154 AML/CFT and Sanctions Control Framework Guideline
16	155 Staff Screening Guideline
17	156 Staff Training and Awareness Guideline
18	157 Failure to comply with AML/CFT and Sanctions Control Framework Guideline
19	158 Compliance Monitoring
20	159 Reliance on Third Parties, Business Introducers, Outsourcing and Insourcing Guideline
21	160 Special types of Customers and transactional activities Guideline
22	161 Name Screening Guideline