

### **Eurobank Anti - Financial Crime Statement**

Eurobank SA and its subsidiaries (hereafter "Eurobank Group") is a banking group headquartered in Athens, Greece. It offers a range of financial products and services to its retail, private and corporate customers. It holds a key position in retail and business banking in Bulgaria and offers Wealth Management services in Cyprus, Luxembourg and London. In Greece, Eurobank is one of the four systemic banks.

Eurobank is regulated and supervised by the European Central Bank (ECB) through the Single Supervisory Mechanism (SSM) and by the Bank of Greece. In addition, each foreign branch or subsidiary is regulated and supervised by the respective financial, regulatory and supervisory authorities of the country in which it operates.

Eurobank Group is committed to the prevention of money laundering and to the fight against terrorist financing. The Group AML/CFT and Sanctions Policy is reviewed, annually or earlier, as necessary by Group compliance, and approved by the Board of Directors, in line with the Greek AML Law 4557/2018, that incorporates the requirements of the relevant EU AML Directive, the respective international AML standards and the Financial Action Task Force (FATF) recommendations. It is designed to ensure that all Eurobank Group companies comply with the requirements and obligations set out in the EU and Greek legislation, as well as all other applicable regulatory requirements.

In this respect, Eurobank has developed and implemented an AML/CFT and Sanctions program consisting of policies, procedures, transaction monitoring systems, internal controls and personnel training in line with applicable laws and regulations, as well as with international best practices. The compliance program, which utilizes a risk-based approach to the management of the Group's money laundering risk, includes, but is not limited to:

- Risk Assessment methodologies;
- Customer Due Diligence, which incorporates Know your Customer policies for the identification and verification of the identity of our customers, including, where applicable, their respective beneficial owners and proxy holders;
- Enhanced due diligence for high-risk clients, including, among others, Politically Exposed Persons, their relatives and close associates;
- The establishment of systems and processes to monitor customer transactions and subsequent reporting of suspicious activity to the appropriate regulatory authority where required;
- The establishment of processes for termination of Customer Business Relationships and Preventing re-entry in order to mitigate ML/TF and/or other financial crime related risks;
- The establishment of policies and procedures to combat tax evasion and ensure compliance with requirements of US Foreign Account Tax Compliance Act (FATCA), OECD Common Reporting Standard (CRS), DAC and QI;
- The adoption of policies and procedures in every jurisdiction in which the Group operates not to process or engage in any activity (regardless of currency) for, on behalf of, for the benefit of, any individual, entity or organization subject to EU, UN, OFAC, HMT sanctions or other applicable sanctions regime;

- Enhanced surveillance regarding financial institutions or territories which may be connected or controlled by terrorist organizations targeted by EU, UN, OFAC, HMT as well as scrutiny of payment transfers to/from these financial institutions or territories;
- The prohibition of the following:
  - The opening or maintenance of secret, anonymous accounts, accounts under fictitious names, and all other similar accounts;
  - The setup of relations or corresponding with shell banks;
  - The offering of Payable-Through Accounts;
  - The opening or maintenance of unlicensed gambling entities;
  - The opening or maintenance of relationships with red-light businesses/adult entertainment;
- The establishment of a framework for the prevention and detection of potential Bribery and Corruption in accordance with relevant legislation and best international standards;
- The appointment of a Money Laundering Reporting Officer and his/her Deputy, as required by local regulation;
- The provision of adequate and frequent training to the Group's staff on the appropriate implementation of applicable laws, rules and standards;
- The retention of customer and transaction records at least for five (5) years after the termination of business relationship with customers, or transaction execution date.

The above program is subject to frequent independent assurance testing and periodic auditing, as per international best practices and applicable regulatory requirements.

Konstantinos Belitsiotis  
Head of Financial Crime  
MLRO



Joanna Kozłowska  
Head of AML/CFT Operations  
d. MLRO

