

Compliance Directorate

Bucharest, 03/11/2022

CERTIFICATE of

Wide Compliance and Anti Money Laundering Rules and Regulations

This is to notify you that **Raiffeisen Bank Romania** complies with the provision set out in the EU Council Directive 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and EU Council Directive 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU, as well as all the directly applicable EU Regulations. Such provisions have been transposed into the Romanian KYC-AML Act (**Law no. 129/2019 with subsequent amendments and completions**) and **NBR Regulation no.2/2019**, issued by the Romanian National Bank. Raiffeisen Bank Romania also complies with the entire national legislation regarding counter terrorism financing and financial sanctions as well as with the mandatory international sanctions regimes (UN, EU, US, National and Austrian sanctions).

Our National Supervisory Authority is the National Bank of Romania (NBR) and the National Office for Prevention and Combating Money Laundering (ONPCSB)- the FIU. All relevant information and legislation can be retrieved from the NBR website (www.bnr.ro) and from the ONPCSB website (www.onpcsb.ro).

Raiffeisen Bank Romania fully complies with the AML/CFT and KYC regulations which require among other things customer due diligence measures, record-keeping and reporting of suspicious transactions to the Romanian Authorities, while being in full compliance with the EU General Data Protection Regulation 2016/679. Therefore, Raiffeisen Bank Romania will not open and maintain accounts for persons using fictitious names, anonymous persons or persons/entities who refuse to disclose their identity, shell companies and banks, persons/entities subject to international sanctions for whom it is forbidden to provide financial services, North Korea, etc. In addition, Raiffeisen Bank Romania also applies a restrictive approach and enhanced due diligence for persons/entities operating in certain domains that bear higher risks as communicated by international organizations or by the National Bank of Romania (eg. Gambling).

In order to assure an optimal monitoring and to detect unusual transactions we defined a customer risk based approach and a due diligence process according to FATF recommendations and Basel Committee provisions.

The main criteria for risk customer rating are: place of residence/incorporation, citizenship, industry, PEP status, organization structure, transactional behavior. Raiffeisen Bank Romania has established risk indicators for: customers, country, products, transactions, Suspicious Activity Reports and additional customer attributes.

Raiffeisen Bank Romania monitors all customer accounts with a dedicated well known software which has as main functionalities: customers segmentation, scenarios, monitoring of trends, mathematical models for unusual behavior detection, hidden relationship detection, clustering detection, link analysis and case management.

There are written procedures in order to report Suspicious Transaction Report internally and to the Romanian Authorities.

Raiffeisen Bank Romania fully complies with anti-terrorist, embargo and international financial sanctions regulations issued by the EU, UN and US and in this respect we screen our customer databases and on-line transactions against EU, UN, OFAC-US, UK and National and Austrian local lists.

Raiffeisen Bank Romania has recognized the importance of FATCA and complies with the FATCA requirements.

Raiffeisen Bank Romania has designated a Compliance Officer to perform risk analysis, develop appropriate policies, procedures, controls and IT systems, being responsible for monitoring whether the bank policies and implemented processes are suitable for the prevention of money laundering, combating terrorist financing and respecting international financial sanctions in order to comply with the relevant laws and international standards, developing and providing staff member training, reporting suspicious activities and performing investigations and providing regular and ad-hoc reporting and advisory to the executive management and Board Members.

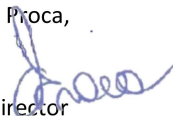
Raiffeisen Bank Romania has a zero tolerance approach to bribery and corruption and has dedicated procedures with which all employees must comply.

Also, the Bank has implemented a whistle-blower procedure, allowing the employees to anonymously report any suspicious activity.

The Bank takes seriously and involves the risks associated with fraud or corruption and promotes both internally and in the relationship with its partners an anti-fraud and anti-corruption culture, based on integrity and honest behavior.

Cristina-Elena Proca,

Compliance Director



Iulia Dinu,

AML Manager

