



Synopsis of the [ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM \(AML/CFT\) POLICY](#)

(As approved by the Bank's Board of Directors on 15.12.2023)

GROUP POLICY FRAMEWORK

Money laundering (hereinafter ML) is the process by which criminals conceal the illegal origin of their property or income.

Terrorist financing (hereinafter TF) is the provision or collection of funds, by any means, directly or indirectly, with the intention that they be used in order to carry out any of the terrorist offences.

The [solvency, the integrity and the reputation](#) of the Bank and of the Group, as well as the reliability of the financial system in general, may suffer greatly as a result of the efforts made by criminals to commit any ML/TF offence. The Bank, taking into account the applicable AML/CFT regulatory framework, including EBA Guidelines, the FATF Recommendations and its Compliance Risk Appetite Statement, applies [at Group level](#) the present AML/CFT Policy, which has been approved by the Board of Directors. The Policy is reviewed annually, or earlier if necessary.

The Group Companies and Branches of the Bank operating in Greece and abroad implement the current AML/CFT Policy by laying down specialised procedures and installing appropriate IT systems.

More specifically:

The Procedures:

- Are adapted to the nature of the business activities of each Group Company and comply with the applicable national regulatory framework.
- Are periodically evaluated and revised when deficiencies are identified or where the need for adjustments arises.

Are approved by the Board of Directors of each Group Company and are communicated to the Employees.

The key new components of the revised AML/CFT Policy include:

- [The role and responsibilities of the management body and the AML/CFT Compliance Officer in the AML/CFT framework](#)
- [The ML/TF Risk Assessment](#)
- [Enhancements on Customer Due Diligence](#)
- [The Remote Customer onboarding](#)
- [Enhancements on Customer periodic review with respect to ML/TF risk](#)
- [Update of the suspicious/unusual transactions Reporting](#)
- [Compliance with sanctions and restrictive measures against countries, persons or entities](#)

ROLE AND RESPONSIBILITIES OF THE MANAGEMENT BODY AND THE AML/CFT COMPLIANCE OFFICER, IN THE AML/CFT FRAMEWORK

The Audit Committee is responsible for ensuring compliance with applicable requirements in the context of the prevention of ML/TF.

The Board of Directors implements the appropriate and effective organisational and operational structure necessary to comply with the AML/CFT strategy, ensures implementation of internal

AML/CFT policies and procedures, reviews the AML/CFT Compliance Officer's activity report and ensures AML/CFT reporting to the competent authority.

The Group Chief of Compliance is responsible for ensuring that the Group's obligations regarding the prevention of the use of the Financial System for ML/TF purposes, are met.

ML/TF RISK ASSESSMENT

Following the Risk Based Approach (RBA), Group Companies take a holistic view of the ML/TF risks to which they are exposed, by identifying and assessing the ML/TF risk associated with the products and services they offer, the jurisdictions they operate in, the Customers they attract and the transaction or delivery channels they use to service their Customers.

The Group Companies classify their Customers, into at least three risk categories: **low**, **medium** or **high**. The categorization is accompanied with the corresponding due diligence measures (**simplified**, **standard**, or **enhanced**, respectively).

CUSTOMER DUE DILIGENCE

The Group Company identifies the areas where it focuses its actions in the context of ML/TF, both when accepting a new Customer and throughout the duration of the business relationship. The CDD measures to be taken include the following:

- (a) identification and verification of the Customer's identity,
- (b) verification of the identity of the beneficial owner,
- (c) creation of a financial/transactional profile,
- (d) scrutiny of all transactions or activities, and continuous monitoring.

REMOTE CUSTOMER ONBOARDING

The Group Company is required to put in place and maintain Policies and procedures regarding the remote Customer onboarding process, including monitoring of the process.

CUSTOMER PERIODIC REVIEW ON ML/TF RISK

The Group Company periodically reviews Customers with regard to their ML/TF risk, taking into account the scope and nature of their business relationship, as well as their transactional activity and financial profile.

REPORTING SUSPICIOUS/UNUSUAL TRANSACTIONS

Upon detection of suspicious or unusual transactions that are not justifiable based on the existing information, the said transactions are reported to the competent FIU.

COMPLIANCE WITH SANCTIONS AND RESTRICTIVE MEASURES AGAINST COUNTRIES, PERSONS OR ENTITIES

The Group Company monitors the respective regulatory framework at Group level, as to achieve full compliance with regulations issued by the European Union and the United Nations Security Council on restrictive measures and sanctions against countries, persons or legal entities, concerning customers, transactions, services and products.

COMPLIANCE WITH OTHER OBLIGATIONS UNDER THE LEGAL AND REGULATORY FRAMEWORK

The effective implementation of AML/CFT Policy is heavily relying on complete and up-to-date training programmes which should reflect the ever-changing conditions. Therefore, each Group Company should provide its personnel with training programmes with regard to AML/CFT matters.

The Group Company which provides payment services, apply the provisions of Regulation (EC) No 2015/847 of the European Parliament and of the Council on information accompanying transfers of funds.