

CERTIFICATE

Raiffeisenverband Salzburg eGen

Compliance, Anti-Money Laundering, Financial Sanctions and Counter-Fraud and Counter- Corruption Rules and Regulations

This is to notify you that **Raiffeisenverband Salzburg eGen (RVS)** and all its branches make every effort to remain in full compliance with the Austrian Banking Act (BWG) and Austrian Finanzmarkt-Geldwäschegesetz (FM-GwG), all applicable financial sanctions and embargoes as well as with the provisions set out in Council Directives **on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (2015/849/EU)**. Such provisions were included in the **Austrian Banking Act** and **Austrian Finanzmarkt-Geldwäschegesetz**, as amended. The Austrian laws are designed to be consistent with FATF Recommendations. Furthermore, Money Laundering and Terrorist Financing are a crime in terms of the Austrian Criminal Code.

Further, **RVS** has developed and implemented anti money laundering programs and principles that are designed to aim for compliance with the applicable anti-bribery and anti-corruption laws and regulations.

Raiffeisenverband Salzburg eGen

- Registration No: FN 38219f
- Supervisory Authority: Austrian Financial Market Authority A-1090 Vienna, Otto-Wagner-Platz 5

The following procedures, which have been approved by senior management and are appropriately exercised in compliance with local legal requirements, include but are not limited to:

General Note

- Board of Management approved AML/Compliance Officer
- Senior Management approved written policies

Customer Due Diligence - ID-Check

- identification and verification of customers and authorized signatories before establishing a business relationship
- identification and verification of customers for transactions amounting to or above EUR 1.000.-
- for suspicious transactions
- nature and purpose of business relationship
- identification of ultimate beneficial owner, this also applies for trustees and trustors
- approval of senior management concerning business relationship with PEPs
- no accounts for persons using fictitious names
- no banking services for shell banks
- no payable through accounts

Risk-based approach

- for customer industries and products, which is also related to country risk
- enhanced due diligence and monitoring for high risk category

Customer Documentation

- record keeping
- records are kept for at least 10 years
- regular updating of customer data

Transaction Monitoring

- automated transaction monitoring
- plausibility checks of account activities
- screening of unusual, complex and conspicuous transactions

Suspicious Transaction Reports

- written procedures
- based on Compliance/ML risk indicators
- to Austrian Financial Intelligence Unit

Financial Sanctions

- RVS implements all applicable financial sanctions and embargoes. For sensitive cases stricter rules may apply
- real time screening of transactions and new clients against all applicable lists (EU, UN, OFAC, UK-HMT, local)
- weekly screening of existing clients against applicable lists of sanctions (EU, UN, OFAC, UK- HMT, local)

Counter-Fraud and Counter-Corruption

- explicit prohibition of any fraudulent activities as well as bribery and facilitation payments communicated to all employees and published in RVS's internal policies
- disciplinary measures in case of breaches
- whistleblowing hotline and other disclosure methodologies in place

Training

- new employees have to attend AML training within the first weeks of joining **Raiffeisenverband Salzburg eGen**
- regular training for employees with direct or indirect customer contact
- trainings are provided in the form of e-learnings and/or classroom trainings depending on necessity and requirements of the employees
- ad hoc trainings
- training communicates at least knowledge about
 - money laundering and sanctions
 - the importance of knowing the customers businesses and behaviors
 - methods and techniques of money laundering
 - setting first proper actions in case of suspicion
 - general employee compliance duties
- the participation is documented for every single employee (name, date of attendance, contents)

For all AML or Financial Sanctions Compliance related issues, **Raiffeisenverband Salzburg eGen** has designated a senior official.

Beneficial Owners of Raiffeisenverband Salzburg eGen:

Upon request we will provide all documents and information, which we may have on our files relating to the identity of each shareholder and underlying beneficial shareholders. In any event, we will provide a competent Austrian authority with the documentation upon their request.

For further information, please see our homepage www.rvs.at or please do not hesitate to contact Mr. Gregor Schober, AML Compliance Officer, rechtsabteilung@rvs.at or +43 662 8886 10610.



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**Raiffeisenverband
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