

Information on Erste Group Business Policy towards Erste Group's Correspondent Banking partners

Erste Group Bank AG and its Members (**Erste Group**) are committed to combating financial crime, bound by regulatory requirements and by our own expectations to protect **Erste Group**, its employees and first of all our customers from financial crime related risks. To achieve this goal **Erste Group** has set up dedicated business policy restrictions. These business policy restrictions reflect different risk scenarios from an overall anti financial crime perspective taking into account various risks, especially such that might be connected to operating in high risk jurisdictions, high risk industries and/or using/providing higher risk products and /or services.

Further, and importantly, as our business policy seeks to implement the highest and most effective standard to combat financial crime, we may not be able to support certain business activity even if it is consistent with local or other applicable anti-financial crime requirements, these include in particular anti money laundering, terrorist financing, anti-bribery and -corruption, sanctions and embargoes, tax-evasion or other related areas of financial crime.

This means that we may not be able to support all of your business activity that relates to certain individuals, entities, countries or territories even if it is not locally prohibited or not subject to local applicable law. As a general matter, with limited exceptions, our policy implements a consistent standard across all jurisdictions and all currencies we are operating in.

To help us comply with our policy, please do not attempt to conduct business activity or transactions involving **Erste Group** (including transactions routed to or from any third parties such as distributors, agents, financial institutions, or others, that ultimately pass through **Erste Group**), that:

- breach applicable anti financial crime law/ regulation;
- breach sanctions implemented or administered by the United Nations Security Council, the European Union (including any of its member states), the United States, or other applicable jurisdictional sanctions requirements;
- and/ or relate directly or indirectly to:
- the Crimea region, Iran, Myanmar, North Korea, Sudan, South Sudan or Syria¹; or
- Cuba, Venezuela or Yemen where there is a US nexus (activity or a transaction that involves USD accounts, products or U.S. Persons).

Please let us know if you are doing, or intend to do, business with countries, territories, governments, individuals, or entities that may be the subject or target of economic sanctions,

¹ This includes that any funds being provided by Erste Group must not be used for any business activity (direct or indirect) in or related to these countries, irrespective of the legal permissibility to such business activity.

countries with high deficiencies or other applicable jurisdictional requirements related to financial crime.

We may need to gather additional information from you including, where applicable, a copy of the appropriate license(s). Please don't make or attempt to resubmit any of these transactions until we have confirmed that they can be processed in line with our financial crime policies as they may be rejected, blocked or returned causing potential further delays.

Specific restrictions for transactions with elevated reputational and non-financial risks:

Erste Group has elevated concerns about the potential reputational and non-financial risks represented by below industries, which are perceived to be vulnerable for money laundering abuse or do not fit to the social responsibility principles **Erste Group** is committed to.

Those industries are:

- Entities involved in on-line gambling located in the United states or any USD denominated transactions related to on-line gambling;
- Payment Service Providers, unless licensed in the European Union and pass ported in our home markets countries;
- Adult entertainment;
- Non-profit/non-governmental organizations;
- Dealers involved in the distribution of arms and munitions;
- Precious metals and gems/mining and extractive industries;
- General trading companies;
- Virtual currencies;
- Shell companies.
- Off-shore banks

For transactions involving those industries, Erste Group reserves the right to send Requests for Information in order to obtain a detailed understanding of the underlying business and parties involved or reject any payments in case of concerns in order to limit any reputational and other non-financial risks, and to stay in line with our principles of social responsibility.