

Attachment II to the Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) v.1.4

This Attachment to the Wolfsberg CBDDQ was completed in order to give additional information to the certain points of the CBDDQ.

This attachment also confirms that the Wolfsberg CBDDQ Declaration Statement signed by the authorized signatories of Erste Group Bank AG is valid and fully applicable to the below mentioned additional information:

#19a1b 19a1c; 19a1e; 19a1f: Erste Group provides nesting/downstream clearing predominantly within the own Group and for local banks domiciled within our home market region where Erste Group has a banking presence, so to enable them to transact their clients' international business in an economically reasonable way. On a rather selective basis correspondent banking services are also provided to banks outside of our home market with the aim to support their local and international currency flows in favor of clients in our home markets. Downstream has to be declared and is provided if all legal obligations and internal policies of Erste Group are adhered to. Downstream clearing related transactions are regularly analyzed, monitored and reported. The approval of the Compliance Department as well as the counterparty's Compliance Department is necessary. Enhanced due diligence measures are applied and a technical monitoring system is set up.

#19b; 19d: Bulk Cash Business mainly covers the cash service in the CEE region of Erste Group including Austria. This service includes the subsidiaries of Erste Group & local banks in the CEE region.

#77: Each client from these industries is subject to individual compliance check and the risk linked with it is assessed separately. Compliance final assessment influences if a relationship will be established and which products will be approved. All approved clients are subject to EDD e.g.

- we accept only licensed clients (gambling/gaming, MSBs, PSPs);
- all existing and new clients who are precious metal dealers are marked as high risk with annual KYC check, including beneficial owner check;
- business relationships involving nuclear power industry are considered eligible solely for countries within Erste Group's domestic markets and EU nations under a very restrictive approach provided that the transaction/business is essential for a nation's energy security. The restrictions are based on a scoring due to internal policy, considering a number of internationally accepted indices measuring the status of the covered country based on legal, political and economic standards. Erste Group maintains a highly restrictive policy regarding transactions in the nuclear energy sector, with the primary objective of refraining from involvement in the expansion of nuclear capacities;
- enhanced monitoring of transactions, etc.

#106c: Due to the fact that the content of the OFSI list is mainly covered by EU/US/UN lists already used in our screening and monitoring system, UK jurisdiction is not generally relevant for our business model and our activities are not directly impacted/legally bound by the UK sanctions regime, we have only included screening against OFSI list in the screening of cross-border payments having an apparent UK nexus in the payment message.

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#106e: The content of sanctions list issued by G7 member countries is mainly covered by EU/US/UN lists which are already used in our screening systems.

For local sanctions lists of G7 members countries, beside the US sanctions list, please note that Erste Group uses its best efforts to comply with all applicable sanctions lists and be fully in compliant with all applicable sanctions regimes and legal requirements (i.e. if certain businesses fall under certain jurisdictions, we are complying with all relevant laws and sanctions regimes, even if they are generally out of scope for Erste Group).

Erste Group Bank AG

Date: 27. November 2024 | 13:38:13 MEZ Date: 26. November 2024 | 18:28:52 MEZ

DocuSigned by:

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Signiert von:

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Mag. Christian Wolf
Head of Financial Institutions