# B-554/2020 / Managing Board

# On the prevention and combating of money laundering and terrorist financing

Document details										
Effective from	07/12/2020									
Version										
Summary (content of policy)	The policy contains the applicable CCD rules and the internal tasks to be performed during the business relationship in order to fight against money laundering.									
Content of modification	Implementation of 26/2020 (VIII.25.) MNB Decree as well as the presentation of the online customer due diligence procedure - which will enter into force with the go-live of VILMA.									
Application Scope	Erste Bank Hungary Ltd.									
Classification	Internal use only									
Invalidated policy	B-202/2020 / Policy on the Prevention and Combating of Money Laundering and Terrorist Financing									
Responsible department	Compliance									
Classification (policy level)	В									
Primary related division(s) (x)	CEO	Х	CFO		соо		CRO	х	Business	х
Publishing (place and time)	07/12/2020									
Next review	07/12/2021									
Higher level policy	A1-648/2018 / Sanctions and Embargoes Policy; A1-437/2020 / Operational Risk Management; A1-085/2019 / AML, KYC, FATCA, CRS Policy									
Process Manager	Process Management and Regulation									

Previous versions	Number	Date of approval	Approved by
Policy on the Prevention and Combating of Money Laundering and Terrorist Financing	B- 202/2020	02/06/2020	Managing Board

Approvers						
Approval level (decision- making competency)	Managing B	oard				
Reason of approval	New policy		Revision		Modification	Х
Date of approval	07/12/2020					
Managing board decision (resolution number)			Board of directors resolution number			



Reviewers					
Process Management and Regulation					
Internal Audit					
General Product Management					
BCM and Crisis Management					
Branch Network					
SME					
Mid-Office					
Capital Markets					
Wealth Management					
Corporate Business Development					
Micro					
Operational Risk Management					
Compliance					
Legal Services and Company Secretariat					
Quality Management					
Card and Consumer Finance					
Information Security					
Large Corporates, Municipalities and Structured Finance					

Connections							
Policy Title	Policy Number	Access for EBH employees	Access for subsidiary employees				

# Substantive scope

The scope of the policy applies to all persons in an employment relationship (with regard to this paragraph including any other employment-related relationship) with the Bank and to all employees having employment relationship with legal entities and other organisations engaged in service activities based on intermediary, outsourcing or service contract concluded with the Bank. In case it is required with regard to the nature of the provided service, it is the duty of the head of the Bank's organisational unit entering into contractual relationship, to disclose the policy to those who have other employment-related relationship with the Bank and who have employment relationship with legal entities and other organisations providing services to the Bank.



# INTRODUCTION

- **1. DEFINITIONS**
- 2. GENERAL PROVISIONS

#### **3. CUSTOMER DUE DILIGENCE OBLIGATION**

**3.1. CUSTOMER DUE DILIGENCE MEASURES** 

#### 3.1.1. Customer data required for identification

- 3.1.1.1. Identification in the case of natural person (private individual)
- 3.1.1.2. Identification of legal persons or unincorporated organisations
- 3.1.1.3. Identification uf individual enterpreneurs

#### 3.1.2. Documents required for identification

*3.1.2.1.* Documents to be submitted during the Customer due diligence of natural persons

3.1.2.2. Documents to be submitted during the Customer due diligence procedure of legal persons and unincorporated business organisation (business organisations)

3.1.2.3. Documents to be submitted in the course of the Customer due diligence of individual contractors

#### 3.1.3. Personal identity verification

#### 3.1.4. Identification of the beneficial owner

3.1.4.1. Declaration of private individuals, agriculturist, private individual Customer with tax number on their beneficial owners

3.1.4.2. Declaration of individual enterpreneurs, representatives of legal persons and unincorporated business organisation Customer on the beneficial owners

3.1.4.3. Repeated declaration

3.1.4.4. Identification statuses based on the Declaration on the beneficial owner

#### 3.1.5. Declaration of politically exposed person

#### 3.1.6. Registration of due diligence data relating to the business relationship and transaction orders

#### 3.1.8. Data change

#### 3.2. Special due diligence cases

3.2.1. Customer due diligence in the case of ad-hoc cash deposits of less than HUF 4.5 million and currency exchange of less than HUF 300.000

3.2.2. Customer due diligence in the case of ad-hoc cash deposits of HUF 4.5 million or more and currency exchange of HUF 300.000 or more, also including the actual related transaction orders

#### 3.2.3. Customers who regularly submit transaction orders

#### 3.2.2. Simplified Customer due diligence

# 3.2.3. Enhanced Customer due diligence

3.2.3.1. Customer due diligence without physical presence – Remote account opening

3.2.3.2. Customer due diligence in the case of correspondent banking and other banking relationship



3.2.3.3. Customer due diligence conducted on politically exposted persons

*3.2.3.4.* Customer due diligence in the case of Customers from high-risk third countries with strategic deficiencies

# 3.2.4. Enhanced Customer due diligence – Other special cases of high risk Customer due diligence

*3.2.4.1.* Customer due diligence procedure on certain high risk legal persons/unincorporated business organisation registered abroad

3.2.4.2. Customer due diligence in the case of off-shore companies and companies with off-shore background

3.2.4.3. Customer due diligence in the case of cash transactions over HUF 50 million

3.3. Customer due diligence measures carried out by another service provider

# 3.3.1. Customer due diligence by an agent

3.4. Real time and non-real time (online) Customer due diligence

3.5. Unsuccessful Customer due diligence

# 4. risk based approach: assessment and management of customer risks

4.1 Management of money laundering risks during the establishment of the customer relationship

# 4.1.1 Business relationship and transaction order requiring authorization

4.1.1.1. Establishing a Customer relationship and execution of a transaction order with the prior authorization of the Head of AML unit

4.1.1.2. Transactions requiring the approval of managers of certain areas

# **4.1.2.** A control of the Customer management processes by Compliance, integrated into the account management system (central control on the onboarding process)

# 4.1.3. Rejection of the establishment of a Customer relationship (unacceptable risk)

# 4.2. The 'Know Your Customer' (KYC) programme

4.2.1. The aim of the KYC programme

# 4.2.2. The concept of the KYC programme

# 4.2.3. KYC documentation

# 4.2.4. Transaction profile

# 4.2.5. Review and revision of the KYC documentation

# 4.3. Risk identification and assessment

# 4.3.1. Customer related high/unacceptable risks

- 4.3.1.1. Based on the Customer characteristics
- 4.3.1.2. Based on the nature of the business activity of the Customer
- 4.3.1.3. Based on the geographical location of the Customer
- 4.3.1.4. Based on the nature of the services used by the Customer

# 4.3.2. Review of the risk assessment

4.4. Compliance Risk Rating (CRR)

4.4.1. Risk rating review



#### 5. Monitoring

- 5.1. Monitoring in a strengthened procedure
- 5.2. Internal control and information system

#### 5.2.1. Monitoring system

# 5.2.2. Whistleblowing reporting system

5.3. Managing dormant accounts

# 6. Measure in case suspicion of money laundering, terrorist financing or the originator of an asset from a criminal aCt arises

6.1. Suspicion of money laundering and unusual transactions

#### 6.2. Reporting obligation

- 6.2.1. Content elements of the report
- 6.2.2. Appointed Officer
- 6.2.3 Forwarding reports to the Financial Intelligence Unit

# 6.2.4. Privacy rules related to notifications

#### 6.3 Suspension of a transaction

- 6.3.1. Report on suspension
- 6.3.2. Suspension

#### 6.3.3. Release the suspension

- 6.4. Prohibition of disclosure
- 6.5. Proposal for termination of the Customer relationship

# 7. Payer's data accompanying fund transfers

8. Register

9. Implementation of restrictive measures imposed by the European Union and the UN Security Council relating to liquid assets and other financial interests

#### 10. Training of employees

10.1. Training types

10.1.1. General training

# 10.1.2. Special training

- 10.2. Topics of the training
- 10.3. Further training
- 10.4. Organisation of the training

