

## **Measures implemented by Slovenská sporiteľňa, a.s. to check transactions and compliance with international sanctions effective from 01.07.2024**

### **International sanctions**

International sanctions are restrictive measures used by the international community (UN) and the EU as a tool to maintain or restore international peace and security, protect basic human rights and fight terrorism. They are adopted in the form of a Resolution of the UN Security Council or a Decision of the Council of the EU and a Regulation of the Council of the EU or the European Commission. Countries may also issue their own sanctions (for example, the USA). The implementation of international sanctions in the Slovak Republic is governed by the [Act No 289/2016](#). (Act on the implementation of international sanctions).

In addition to international sanctions announced by the UN and the EU, Slovenská sporiteľňa, a.s. (hereinafter "Bank") also implements sanctions declared by the United States of America. These sanctions are administered by the Office of Foreign Assets Control (OFAC). For more information, please, refer to the [OFAC website](#). The countries and specific arrangements that are subject to international sanctions or embargoes can be found on the [EU Sanctions Map](#).

For more information on the application of international sanctions, please, refer to the websites of the [Ministry of Finance of the Slovak Republic](#) as the national competent authority responsible for the implementation of international sanctions in the Slovak Republic.

### **Execution of payment services by Slovenská sporiteľňa, a.s.**

When making payments from and to countries that are subject to sanction restrictions, or countries considered to be high risk, Client is obliged to submit to the Bank additional documents and information proving the purpose and specific subject of the payment, such as contracts, invoices, transport and customs documents, export licenses, certificates of origin of goods, etc., depending on the nature of the payment. Client also has this obligation in respect of payments made from and to countries not considered to be high risk if the provision of relevant documents is required under Sections 10 to 12 of the [Act No 297/2008](#) on the protection against the legalisation of proceeds of crime and the financing of terrorism (hereinafter "AML Act").

If the Client fails to provide to the Bank the necessary documents and information for the payment to be made, or provides incomplete documents and information, or if there are any doubts on the part of the Bank as to their authenticity or truthfulness, the Bank will refuse to make the payment and inform the Client accordingly in the manner agreed in the Terms and Conditions of Payment Services of Slovenská sporiteľňa, a. s. in effect from 1 January 2015 (hereinafter "TCPS"). In specific cases, the Bank may also terminate the business relationship with the Client.

For payments made on the basis of a Payment Order for Domestic Transfer and Payment Order for Cross-Border Transfer, the Client is always obliged to indicate in the Payment Order the complete name and surname of the payee for natural persons, or the full registered name of the payee for legal entities (i.e. business name including legal form or name). If this requirement is not met, the Bank will have the right to refuse to execute the payment and inform the Client accordingly in the manner agreed in the TCPS.

### **Prohibited countries to and from which the Bank will not execute Cross-Border Transfers**

The prohibited (most sanctioned) countries are the countries or territories that are subject to comprehensive international sanctions, or whose governments are comprehensively sanctioned, and any direct or indirect cooperation or transaction with them within the Bank is prohibited. They are the following countries:

| Country name          | Country code |
|-----------------------|--------------|
| North Korea           | KP           |
| Iran                  | IR           |
| Myanmar               | BU           |
| Syria                 | SY           |
| Sudan                 | SD           |
| South Sudan           | SS           |
| Crimea and Sevastopol | -            |

The Bank will not execute cross-border transfers from or to a prohibited country. The Bank will also not execute a Cross-Border Transfer from or to a country not included in the list of prohibited countries if the Bank is aware that the transfer is to be executed, whether directly or indirectly, from or to a prohibited country through entities having the registered office or place of business or residence in a country other than a prohibited country, and/or that its aim or purpose is to obtain or provide supply from or to an entity having its registered office or place of business or residence in a prohibited country, or to deliver the subject of supply from or to a prohibited country.

**High-risk countries in which it is not possible to guarantee the successful execution of a Cross-Border Transfer because of the overall situation in the country**

High-risk countries are countries having strategic deficiencies in their anti-money laundering and counter-terrorist financing mechanisms that represent significant threats to the financial system of the Slovak Republic and the European Union, as well as countries where, because of the current geopolitical situation, it is not possible to guarantee the execution of a Cross-Border Transfer by the Bank despite the Bank meeting all its obligations in respect of the execution. The list of high-risk countries is determined on the basis of [Commission Delegated Regulation \(EU\) 2016/1675 of 14 July 2016](#) supplementing [Directive \(EU\) 2015/849 of the European Parliament and of the Council](#) by identifying high-risk third countries with strategic deficiencies, the [list of countries deemed by the EU to be non-cooperating for tax purposes](#) and, also, the [FATF Financial Action Committee's lists of high-risk countries](#), as well as other internal lists of countries and territories that are considered high-risk by Slovenská sporiteľňa, a. s. and the Bank Group. Such countries and territories include the following:

|     | Country name        | Country code |
|-----|---------------------|--------------|
| 1.  | Afghanistan         | AF           |
| 2.  | American Samoa      | AS           |
| 3.  | Antigua and Barbuda | AG           |
| 4.  | Armenia             | AM           |
| 5.  | Azerbaijan          | AZ           |
| 6.  | Bahamas             | BS           |
| 7.  | Barbados            | BB           |
| 8.  | Belize              | BZ           |
| 9.  | Belarus             | BY           |
| 10. | Burkina Faso        | BF           |
| 11. | Fiji                | FJ           |
| 12. | Philippines         | PH           |
| 13. | Gibraltar           | GI           |
| 14. | Georgia             | GE           |

|     |                                  |    |
|-----|----------------------------------|----|
| 15. | Guam                             | GU |
| 16. | Haiti                            | HT |
| 17. | Jamaica                          | JM |
| 18. | Yemen                            | YE |
| 19. | Jordan                           | JO |
| 20. | Republic of South Africa         | ZA |
| 21. | Cayman Islands                   | KY |
| 22. | Cambodia                         | KH |
| 23. | Cameroon                         | CM |
| 24. | Kazakhstan                       | KZ |
| 25. | Kyrgyzstan                       | KG |
| 26. | Democratic Republic of the Congo | CD |
| 27. | Cuba                             | CU |
| 28. | Mali                             | ML |
| 29. | Morocco                          | MA |
| 30. | Mozambique                       | MZ |
| 31. | Nigeria                          | NG |
| 32. | Palau                            | PW |
| 33. | Panama                           | PA |
| 34. | Virgin Islands (USA)             | VI |
| 35. | Russian Federation               | RU |
| 36. | Samoa                            | WS |
| 37. | Senegal                          | SN |
| 38. | Seychelles                       | SC |
| 39. | United Arab Emirates             | AE |
| 40. | Tanzania                         | TZ |
| 41. | Trinidad and Tobago              | TT |
| 42. | Turkey                           | TR |
| 43. | Turks and Caicos Islands         | TC |
| 44. | Uganda                           | UG |
| 45. | Ukraine                          | UA |
| 46. | Uzbekistan                       | UZ |
| 47. | Vanuatu                          | VU |
| 48. | Venezuela                        | VE |
| 49. | Vietnam                          | VN |