

# CERTIFICATE

of

**Zveza Bank Group**

## **Wide Compliance and Money Laundering Rules and Regulations**

This is to notify you that **ZVEZA BANK r. z. z o. j., Bank und Revisionsverband, reg. Gen. m. b. H.** and its branch in Ljubljana, Slovenia, fully comply with the Austrian Banking Act and with the provisions set out in Council Directives number 308 of 10<sup>th</sup> June 1991 on Prevention of the Use of the Financial System for the Purpose of Money Laundering (91/308/EEC last revision 01/97 /EEC). Such provisions have been included in the **Austrian Banking Act** of 1994, as amended.

### **ZVEZA BANK r. z. z o. j., Bank und Revisionsverband, reg. Gen. m. b. H.**

- License No: GZ: 29 0350/6 - FMA - 1/2/03
- Registration No: FN 115073 a
- Supervisory Authority: Austrian Financial Market Authority  
A-1020 Vienna, Praterstraße 23

The following procedures are to be understood as the **minimum** requirements for the **ZVEZA BANK, r. z. z o. j., Bank und Revisionsverband, reg. Gen. m. b. H.:**

#### **Customer Due Diligence – ID-Check**

- before opening an account
- for transactions amounting to or above € 15.000,--
- for suspicious transactions
- purpose of account
- establishment of ultimate economic beneficiary; this also applies for lawyers, notaries, certified public accountants, tax advisors and trustees
- no accounts for persons using fictitious names
- no banking services for shell banks

#### **Customer Documentation**

- record keeping
- these records must be kept for 7 years
- regular updating of customer data

#### **Suspicious Transaction Reports**

- based on Compliance/ML risk indicators
- to Austrian Financial Intelligence Unit (BKA)

## Training

- retraining for every employee on a regular basis
- training must at least communicate knowledge about
  - money laundering itself
  - the importance of knowing the customers businesses and behaviors
  - methods and techniques of money laundering/fraud
  - how to detect possible money laundering/fraud
  - setting first proper actions in case of suspicion
- the participation must be documented for every single employee (name, date of attendance, contents)
- regular verification of quality and efficiency of our policies

For all compliance related issues, such as AML and Fraud Prevention, **ZVEZA BANK r. z. z o. j., Bank und Revisionsverband, reg. Gen. m. b. H.** designated a senior official.

This Certificate is also valid for Zveza Bank Branch Ljubljana, Slovenia.

Klagenfurt/Celovec, April 2008