

CERTIFICATE

OF

Raiffeisen Bank International AG Group Compliance, Anti-Money Laundering, Financial Sanctions and Counter-Fraud and Counter- Corruption Rules and Regulations

This is to notify you that **Raiffeisen Bank International AG** and all its branches and subsidiaries (RBI Group) make every effort to remain in full compliance with the Austrian Banking Act (BWG), Austrian Financial Markets Anti-Money Laundering Act (FM-GwG) and Austrian Beneficial Owner Registry Act (WiEReG), all applicable financial sanctions and embargoes as well as with the provisions set out in Council Directives **on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing** (2015/849/EU). Such provisions were included in the **Austrian Banking Act (BWG), Austrian Financial Markets Anti-Money Laundering Act (FM-GwG) and Austrian Beneficial Owner Registry Act (WiEReG)**, as amended. The Austrian laws are designed to be consistent with FATF Recommendations. Furthermore, Money Laundering and Terrorist Financing are a crime in terms of the Austrian Criminal Code.

Further, **Raiffeisen Bank International AG** has developed and implemented anti money laundering programs and principles that are designed to aim for compliance with the applicable anti-bribery and anti-corruption laws and regulations.

Raiffeisen Bank International AG

- Registration No: FN 122119m
- Supervisory Authority: Austrian Financial Market Authority
A-1090 Vienna, Otto-Wagner-Platz 5

The following procedures, which have been approved by senior management and are appropriately exercised in compliance with local legal requirements wherever the Group is active, include but are not limited to:

General Note

- Board of Management approved AML/Compliance Officer
- Senior Management approved written policies

Customer Due Diligence – ID-Check

- identification and verification of customers and authorized signatories before establishing a business relationship
 - identification and verification of customers for transactions amounting to or above € 15,000.–
 - for suspicious transactions
 - nature and purpose of business relationship
 - identification of ultimate beneficial owner, this also applies for trustees and trustors
 - approval of senior management concerning business relationship with PEPs and correspondent banks
 - no accounts for persons using fictitious names
 - no banking services for shell banks
 - no payable through accounts
-

Risk-based approach

- for customer industries and products, which is also related to country risk and transactions
- enhanced due diligence for high risk category

Customer Documentation

- record keeping
- records are kept for at least 5 years
- regular updating of customer data

Transaction Monitoring

- automated transaction monitoring
- plausibility checks of account activities
- analysis of payment corridors
- screening of unusual, complex and conspicuous transactions
- evaluation of effectiveness of scenarios

Suspicious Transaction Reports

- written procedures
- based on Compliance/ML risk indicators
- to Austrian/local Financial Intelligence Unit

Financial Sanctions

- RBI Group implements all applicable financial sanctions and embargos. For sensitive cases, stricter rules may apply, for example business with Syria or North Korea is not executed
- real time screening of transactions against all applicable lists (EU, UN, OFAC, UK-HMT, local)
- daily screening of existing clients against list of sanctions (EU, OFAC, UK-HMT, local)

Counter-Fraud and Counter-Corruption

- explicit prohibition of any fraudulent activities as well as bribery and facilitation payments communicated to all employees and published in RBI's Code of Conduct and mandatory Group Regulations applicable for all entities
- responsibilities assigned for all measures related to fraud and corruption prevention in Head Office and all subsidiaries with a direct reporting line to the relevant Group function in Vienna
- risk based models for countries, entities, and industries
- implementation of consistent counter-fraud and counter-corruption framework in all entities including automated reporting mechanisms
- annual control assessments regarding reliability and efficiency of the respective control frameworks
- disciplinary measures in case of breaches
- close and regular information exchange between AML and Counter-Fraud functions
- whistleblowing hotline and other disclosure methodologies in place

Training

- new employees have to attend AML training within the first 3 months of joining **Raiffeisen Bank International AG**
- annual training for employees with direct or indirect customer contact (i.e. Relationship Manager or Sales Department)
- trainings are provided in the form of e-learnings and/or classroom trainings depending on necessity and requirements of the employees
- ad hoc trainings
- advanced training sessions
- training communicates at least knowledge about
 - money laundering and sanctions
 - the importance of knowing the customers businesses and behaviors
 - methods and techniques of money laundering, fraud, bribery and corruption
 - how to detect possible money laundering and fraud
 - setting first proper actions in case of suspicion
 - general employee compliance duties
- the participation is 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, Financial Sanctions and Counter-Fraud and Counter -Corruption activities, **Raiffeisen Bank International AG** has designated a senior official.

This Certificate is also valid for Raiffeisen Bank International AG London Branch, Raiffeisen Bank International AG Beijing Branch, Raiffeisen Bank International AG Frankfurt Branch, Raiffeisen Bank International AG Singapore Branch, RB International Markets (USA) LLC New York and all subsidiaries of **Raiffeisen Bank International AG**.

Upon request we will provide all documents and information, which we may have on our files relating to the identity of each shareholder and underlying beneficial shareholders to the extent permitted by Austrian law. In any event, we will provide a competent Austrian authority with the documentation upon their request and to the extent permitted by Austrian law.

For further information, please see our homepage www.rbinternational.com or please do not hesitate to contact Mr. Christoph Lehner, Compliance Officer, compliance@rbinternational.com or +43 1 71 707 1552.

Yours sincerely,



12.9.2019

 **Raiffeisen Bank
International**
RAIFFEISEN BANK INTERNATIONAL AG
Am Stadtpark 9, A-1030 Wien