

## **Anti-Financial Crime (AFC) Policy Letter**

UniCredit Bank Austria complies with all applicable legal and regulatory requirements for the prevention and detection of money laundering, terrorism financing, bribery and corruption.

UniCredit Bank Austria has implemented AML controls that comply with the Austria AML legislation, as well as the EU AML legislation and the FATF recommendations. Furthermore, UniCredit Bank Austria adheres to the Wolfsberg Group Payment Transparency Standards.

The AML programm includes:

- the appointment of a Chief Compliance Officer who leads a team of employees with sufficient expertise and experience in Anti-Financial Crime;
- the implementation of reasonable due diligence and the collection of Know Your Customer ("KYC") documentation which includes identification and verification of ultimate beneficial owners;
- the monitoring of KYC dokumentation;
- the implementation of systems and processes that are designed to detect and report irregular and suspicious activity and unusual transactions. Any suspicious activity is reported to the appropriate authorities;
- the implementation of systems and processes to identify higher-risk elements. This includes, but is not limited to politically exposed persons and higher-risk jurisdictions. Appropriate enhanced due diligence measures are undertaken whenever a higher-risk element is identified;
- the daily monitoring against global sanctions and watch lists. This includes, but is not limited to the various lists published by the European Union, the United Nations Security Council Committee, the UK Treasury and the US Office of Foreign Asset Control
- the implementation of reasonable measures to satisfy the legitimacy of customer's source of funds and source of wealth
- annual training of all relevant employees in AML procedures. Training records are maintained in accordance with applicable AML regulations.

Correspondent bank relationships must not be used to:

- facilitate payments linked to illegal activities, such as money laundering, terrorist financing, human trafficking, drug trafficking and arms trafficking;
- facilitate payments and/or transactions for persons or entities subject to any sanctions administered or enforced by the Office of Foreign Assets Control of the U.S. Treasury Department, the United Nations and the European Union;

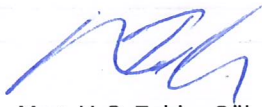
- facilitate payments on behalf of Shell Banks, or banks that permit relationships with Shell Banks;
- facilitate payments on behalf of banks that do not have licenses and/or are not financially regulated, or operating under an Offshore Banking License;
- facilitate payments on behalf of non-bank financial institutions such as remittance or exchange houses, casas de cambio, bureaux de change and money transfer agents or entities or persons effectively operating as such.

The use of Payable-Through-Accounts is prohibited by UniCredit Group and 'Vostro' accounts held with UniCredit Group can only be used by authorized representatives of the respondent (e.g. by means of authenticated SWIFT messages) and not directly by the respondent's clients.

Finally, we would like to highlight that UniCredit Bank Austria is subject to regular internal and external audits as well as by the respective regulator (Financial Market Authority).

Yours sincerely,

UniCredit Bank Austria



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Head of Anti Financial Crime