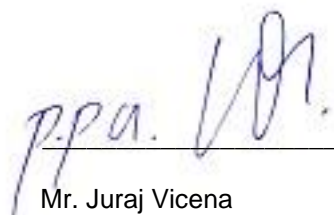


## Anti Money Laundering (AML) & Combating the Financing of Terrorism (CFT) policy

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1. HYPO NOE Landesbank für Niederösterreich und Wien AG<sup>1</sup> (hereinafter referred to as “HYPO NOE”) registered in Hypogasse 1, 3100 St. Pölten - Austria, is an Austrian universal bank.
2. The republic of Austria is (inter alia) a member of the European Union, the FATF<sup>2</sup>, and the Basel Committee on Banking Supervision<sup>3</sup>. Access to banking activities in Austria is regulated by the Austrian Banking Act (BWG = “Bankwesengesetz”), which became effective on 1<sup>st</sup> of January 1994.
3. HYPO NOE operates under the supervision of the Austrian Financial Market Authority “Finanzmarktaufsicht”<sup>4</sup>. With regard to the legal requirements HYPO NOE has always followed a policy of strict compliance: the bank complies with the Austrian Banking Act, which incorporates FATF-standards and the current legislation of the European Union against money laundering and financing of terrorism.
4. HYPO NOE has effectively implemented a written Anti-Money Laundering Policy within its internal structure in order to prevent money laundering and mitigate the adverse effects of criminal economic activity. This policy has been approved by the board of directors and is valid and binding for all branches, subsidiaries, employees and clients conducting banking business. The main elements of the Anti-Money Laundering Policy include:
  - identification and verification of customers and their beneficial owners;
  - embargo controls for all new customers;
  - risk assessment and appropriate due diligence measures (“Know Your Customer”) according to the terms of the Austrian Banking Act;
  - on-going staff training with the focus on the prevention of money laundering and combating the financing of terrorism;
  - controlling and monitoring of money transactions using specific IT-based AML systems;
  - procedures for reporting of suspicious transactions to the relevant authority; and
  - designation of an AML-Officer for internal AML-prevention and AML-trainings.
5. The AML-Officer reports directly to the board of directors. AML Office is subject to regular audits by the internal audit department and the auditor. Please note, that HYPO NOE doesn't maintain business relations with shell banks or anonymous customers. For further questions do not hesitate to contact us ([compliance@hyponoe.at](mailto:compliance@hyponoe.at)).

St. Pölten, 8th July 2024



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Mr. Juraj Vicena

Head of Compliance & AML

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<sup>1</sup> Aktiengesellschaft = joint stock company under Austrian Law.

<sup>2</sup> FATF = Financial Action Task Force ([www.fatf-gafi.org](http://www.fatf-gafi.org)): The Financial Action Task Force (FATF) is an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, financing of terrorism and other related threats to the integrity of the international financial system.

<sup>3</sup> <https://www.bis.org/bcbs/>

<sup>4</sup> <https://www.fma.gv.at/en/>