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### **Eurobank Bulgaria AD – Financial Crime statement**

Eurobank Bulgaria AD is one of the biggest banks in Bulgaria in terms of assets, having a broad branch network across the country and a considerable client base of individuals, companies and institutions. As one of the leaders in Bulgaria's banking sector, Eurobank Bulgaria AD offers a comprehensive range of financial products and services to its retail and corporate customers.

Eurobank Bulgaria AD is regulated and supervised by the Bulgarian National Bank. Its parent company, Eurobank S.A. is regulated and supervised by the Bank of Greece and by the European Central Bank (ECB) as per the Single Supervisory Mechanism (SSM).

Eurobank Bulgaria AD is committed to the prevention of money laundering and to the fight against terrorist financing. The AML/CFT policy is frequently reviewed and approved by the Management Board in line with the Bulgarian Law on Measures Against Money laundering and the Law on Measures Against Terrorism financing, that incorporate the requirements of the EU 4<sup>th</sup> AML Directive, the respective AML regulations and the Financial Action Task Force (FATF) recommendations. It is designed to ensure that the Bank complies with the requirements and obligations set out in the EU and Bulgarian legislation, as well as all other applicable regulatory requirements.

In this respect, Eurobank Bulgaria has developed and implemented a compliance program consisting of policies, procedures, transaction monitoring systems, internal controls and personnel training in compliance with applicable laws and regulations, as well as with international best practices. The compliance program, which utilizes a risk based approach to the management of the Bank's money laundering risk, includes, but not limited to:

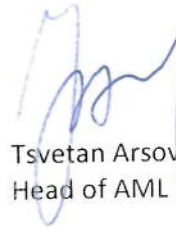
- Customer Due Diligence, which incorporates Know your Customer policies for the identification and verification of the identity of our customers, including, where applicable, their respective beneficial owners and proxy holders;
- Enhanced due diligence for high-risk clients, including Politically Exposed Persons, their relatives and close associates;
- The establishment of systems and processes to monitor customer transactions and subsequent reporting of suspicious activity to the appropriate regulatory authority where required;
- The establishment of policies and procedures to combat tax evasion and ensure compliance with requirements of US Foreign Account Tax Compliance Act (FATCA) and OECD Common Reporting Standards (CRS);
- The adoption of policies and procedures not to process or engage in any activity (regardless of currency) for, on behalf of, or for the benefit of any individual, entity or organization subject to comprehensive EU, UN, OFAC, HMT sanctions or other applicable sanctions regime;

- Enhanced surveillance regarding financial institutions or territories which may be connected or controlled by terrorist organizations targeted by EU, UN, OFAC, HMT as well as scrutiny of payment transfers to/from these financial institutions or territories;
- Prohibition of the following:
  - The opening or maintenance of secret, anonymous accounts, accounts under fictitious names and all other similar accounts;
  - The setup of relations or corresponding with shell banks;
  - The offering of payable-through accounts directly or through domestic or foreign corresponding banking clients;
- The establishment of a framework for the prevention and detection of potential Bribery and Corruption in accordance with relevant legislation and best international standards;
- The appointment of a Money laundering reporting Officer and his/her Deputy;
- The provision of adequate and frequent training to the Bank's staff on the appropriate implementation of applicable laws, rules and standards;
- The retention of customer and transaction records at least for 5 (five) years after the termination of business relationship with customers, or transaction execution date.

The above are subject to frequent independent assurance testing and periodic auditing, as per international best practices and applicable regulatory requirements.



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