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Compliance Division
260, Okolovrasten pat
1766, Sofia
Bulgaria

Eurobank Bulgaria AD – Financial Crime statement

Eurobank Bulgaria AD is one of Bulgaria's leading banks, offering innovative financial solutions for individual and business customers. With a stable financial position and a focus on digital services, the bank continues to develop modern and accessible banking for its customers.

Eurobank Bulgaria AD is licensed and regulated by the Bulgarian National Bank and is subject to prudential supervision by the Bulgarian National Bank together with the European Central Bank within the framework of the Single Supervisory Mechanism. Its parent company, Eurobank S.A., is regulated and supervised by the European Central Bank through the Single Supervisory Mechanism and by the Bank of Greece.

Eurobank Bulgaria AD is committed to the prevention of money laundering and to the fight against terrorist financing. The Bank's AML/CFT and Sanctions Policy is reviewed, annually or earlier, as necessary, and is approved by the Management Board, in line with the Bulgarian Law on Measures Against Money Laundering and the Law on Measures Against the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction, that incorporate the requirements of the relevant EU 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.

Vesela Stefanova
Chief Compliance Officer/ GM

Tsvetan Arsov
Strategic Lead AML/ CFT/ Sanctions Compliance