

Concept and fundamental principles of the Bank protection against money laundering and terrorism financing

COMMERZBANK Aktiengesellschaft, Kaiserstrasse 16, 603 11 Frankfurt am Main, Federal Republic of Germany, recorded in the Commercial Register of the District Court in Frankfurt am Main under the Number HR B 32000, acting through the organisational unit

COMMERZBANK Aktiengesellschaft, Foreign Bank Branch, Bratislava, Rajska 15/A, 811 08 Bratislava, Organisation Identification No.: 30 847 737, recorded in the Commercial Register of the District Court Bratislava I, Section: Po, File Cover No.: 1121/B, (hereinafter „the Bank“)

declare hereby,

that within the scope of their activities, rigorous rules are applied to guarantee protection against regularisation of receipts derivable from criminal activities and protection against terrorism financing (hereinafter „AML rules“).

The concept and fundamental principles of the Bank protection against money laundering and terrorism financing (hereinafter „Concept of the Bank Protection“) take into account standards recognised on the international level, regulations valid within EU, the Slovak Republic legislation, enforceable standards governing the areas of money laundering and terrorism financing prevention. They include fundamental principles, be they applied by the Bank with regard to their Clients, as well as in relation to their own Employees with a view to avoid the Bank misuse for the purpose of money laundering or terrorism financing.

In particular, the Concept of the Bank Protection is based on the Banking Act No. 483/2001, Act No. 297/2008 on Protection against Regularisation of Receipts Derivable From Criminal Activities and Protection against Terrorism and the NBS Financial Supervision Unit Methodical Guidelines of November 20 17, 2012, No. 9/2012 on the Bank and Foreign Bank Branch Protection against Money Laundering and Terrorism Financing.

The Concept of the Bank Protection is incorporated in the contents of the Bank internal regulations and organisation structure, it is continuously enforced and implemented by the Statutory Body members, Bank Head Manager, Managers and Employees carrying out financial operations of the Bank Clients on individual Bank workplaces.

COMMERZBANK Aktiengesellschaft, Foreign Bank Branch, Bratislava, implement AML rules, first of all, through the following activities:

- stringent application of legislation,
- their own internal policy in the AML area,
- individual approach to Clients,
- precautionary measures,
- training activities,
- verification activities,
- assessment and update,
- monitoring activities.