

# CERTIFICATE

of

## Posojilnica Bank eGen

### Wide Compliance and Money Laundering Rules and Regulations

This is to notify you that **Posojilnica Bank eGen** and its branches in Carintia fully comply with the Austrian Banking Act and with the provisions set out in Council Directives number 308 of 10<sup>th</sup> June 1991 on Prevention of the Use of the Financial System for the Purpose of Money Laundering (91/308/EEC last revision 01/97 /EEC). Such provisions have been included in the **Austrian Banking Act** of 1994, as amended.

#### Posojilnica Bank eGen

- License No: GZ: 29 0350/6 - FMA -1/2/03
- Registration No: FN 115073 a
- Supervisory Authority: Austrian Financial Market Authority  
A-1020 Vienna, Praterstraße 23

The following procedures are to be understood as the **minimum** requirements for the **Posojilnica Bank eGen**:

#### Customer Due Diligence – ID-Check

- before opening an account
- for transactions amounting to or above € 15.000,--
- for suspicious transactions
- purpose of account
- establishment of ultimate economic beneficiary; this also applies for lawyers, notaries, certified public accountants, tax advisors and trustees
- no accounts for persons using fictitious names
- no banking services for shell banks

#### Customer Documentation

- record keeping
- these records must be kept for 7 years
- regular updating of customer data

#### Suspicious Transaction Reports

- based on Compliance/ML risk indicators
- to Austrian Financial Intelligence Unit (BKA)

## Training

- retraining for every employee on a regular basis
- training must at least communicate knowledge about
  - money laundering itself
  - the importance of knowing the customers businesses and behaviors
  - methods and techniques of money laundering/fraud
  - how to detect possible money laundering/fraud
  - setting first proper actions in case of suspicion
- the participation must be documented for every single employee (name, date of attendance, contents)
- regular verification of quality and efficiency of our policies

For all compliance related issues, such as AML and Fraud Prevention, **Posojilnica Bank eGen** designated a senior official.

This Certificate is also valid for Zveza Bank Branch Ljubljana, Slovenia.