

ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM
(AML/CFT) POLICY

The legalisation of proceeds of criminal activities or “Money Laundering” (hereinafter “ML”) refers to all activities intended to conceal the illegal source of funds.

The financing of terrorism (hereinafter “FT”) refers to activities intended to channel funds to third parties for terrorist purposes.

The solvency and the reputation of the Company may suffer greatly as a result of the efforts made by criminals to conceal the source of the proceeds of criminal activities or to channel funds to terrorist activities.

Identifying the risks arising from ML and FT activities and their potential consequences, as well as the importance of combating financial crime, and taking also into account the provisions of the recommendations of the Financial Action Task Force (F.A.T.F.) and of the regulatory framework in force, the Company has introduced specialized procedures and implemented the Anti-Money Laundering and Combating the Financing of Terrorism Policy (AML/CFT Policy).

The Company, as member of Alpha Bank Group and in cooperation with Alpha Bank Branches, has access to Alpha Bank IT systems and is informed on a continuous basis. To be noted that customers are classified for ML/FT risk in four risk categories, unacceptable, high-risk, medium and low risk, by Alpha Bank Branches.

The Company has appointed an AML/CFT Officer and an alternate thereof. The AML/CFT Officer shall be responsible for ensuring the proper and adequate implementation of the AML/CFT Policy.