

Koper, 4th June 2020

AML Statement

We, Banka Intesa Sanpaolo d.d., declare that we maintain AML/KYC policy and fully comply with international efforts to fight money laundering and terrorist financing as well as other criminal activities.

Banka Intesa Sanpaolo d.d. has its headquarters in Koper, Slovenia and is supervised by the Central Bank of Slovenia which ensures that Banka Intesa Sanpaolo d.d., is fully compliant with the entire regulatory framework regarding AML and FT regulations.

All AML/KYC policies and procedures adopted in compliance with national and international anti-money laundering legislation and standards are applied in all our branched and we are fully compliant with the requirements of the FATF Statement.

Banka Intesa Sanpaolo d.d. has implemented the anti-money laundering program in line with the Slovenian Prevention of Money Laundering and Terrorist Financing Act (Official Gazette of the Republic of Slovenia, no. 68/2016, dated 4th November 2016), as well as with local and international regulations and guidance for prevention of money laundering, terrorist financing and financial crimes.

The AML program includes:

- written policies and procedures,
- a designated AML officer,
- regular training for relevant employees,
- independent audit to test the implementation of the program.

Banka Intesa Sanpaolo d.d. has adopted the Wolfsberg Anti-Money Laundering principles as part of its anti-money laundering and terrorist financing compliance efforts. Banka Intesa Sanpaolo d.d. takes steps to ensure that it is in compliance with entire embargo regulations framework applicable in the EU. Banka Intesa Sanpaolo d.d., maintains lists updated by multiple sources, including EU and Office of Foreign Assets Control (OFAC).

Banka Intesa Sanpaolo d.d. uses its best efforts to ensure compliance with these prohibitions and restrictions and to detect suspicious activities using technical and/or manual monitoring systems.

Every suspicious activity detected is reported in accordance with applicable Slovenian AML and FT law.

Banka Intesa Sanpaolo d.d. does not maintain business activities with shell banks.

All other documentation, such as the Wolfsberg Questionnaire and Patriot Act is available on our webpage: <http://www.intesasanpaolobank.si/>

Sincerely,

AML Officer