

Strategy for prevention of money laundering and terrorist financing (AML/CFT Strategy)

In order to prevent the misuse of Raiffeisen Bank International AG Slovak Branch, pobočka zahraničnej banky (hereinafter referred to as "RBI SK branch") for the purpose of money laundering and financing of terrorism, the following AML/CFT Strategy is issued.

The AML/CFT Strategy respects recognized international standards, EU regulations and the laws of the Slovak Republic, in particular Act No. 297/2008 Coll. on protection against money laundering and financing of terrorism and on amendment and supplementation of certain acts, as amended, as well as sub-legal standards applicable in the field of prevention of money laundering and financing of terrorism. It contains the basic principles that RBI SK branch applies both in relation to its customers and in relation to its employees in order to prevent its misuse for money laundering or terrorist financing.

RBI SK branch declares a 'zero tolerance' attitude towards money laundering and terrorist financing. RBI SK Branch does not directly or indirectly support people and organizations that launder money and commit the crimes of money laundering and terrorist financing.

RBI SK Branch has implemented an AML/CFT Program of activities aiming to prevent money laundering and financing of terrorism (AML Program), which all employees are expected to comply with. Furthermore, RBI SK Branch will do everything in its power to contribute to the prevention of money laundering and the financing of terrorism.

RBI SK Branch has developed and implemented a system for assessing the risks of money laundering and terrorist financing. This system considers internationally recognized standards and appropriately applies the rules as defined by Raiffeisen Bank International AG in RBI SK Branch.

RBI SK branch has an effective system for detecting suspicious situations and transactions which may constitute money laundering or the financing of terrorism. All business transactions where RBI SK branch knows, suspects or has reasonable grounds to suspect that they constitute money laundering or terrorist financing are immediately reported to the Financial Intelligence Unit of the Financial Police in the manner prescribed by law.

RBI SK branch has established a system for the implementation of staff training in the area of the prevention of money laundering and terrorist financing. Every new employee, irrespective of his/her position, shall undergo a training in the prevention of money laundering and terrorist financing. Periodic training of staff is carried out annually.

RBI SK branch has an effective internal control system, which also covers the prevention and detection of acts that may constitute money laundering and financing of terrorism and the implementation of measures in the area of preventing money laundering and financing of terrorism.

All of the above basic principles have been elaborated and specified in a number of internal rules. Among the most important ones are the AML Program and the RBI Regulation on Anti-Money Laundering (REG-2017-0071) together with the supplementary documentation.

Management of Raiffeisen Bank International AG Slovak Branch,
pobočka zahraničnej banky
Bratislava

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