

Certificate  
Of

**Kathrein Privatbank Aktiengesellschaft Compliance, Anti Money  
Laundering, Financial Sanctions and Counter-Fraud and Counter-  
Corruption Rules and Regulations**

This is to notify you that **Kathrein Privatbank Aktiengesellschaft** and subsidiaries make every effort to remain in full compliance with the Austrian Banking Act (BWG), Austrian Financial Markets Anti-Money Laundering Act (FM-GwG) and Austrian Beneficial Owner Registry Act (WiEReG), all applicable financial sanctions and embargoes as well as with the provisions set out in Council Directives **on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (2015/849/EU)**. Such provisions were included in the **Austrian Banking Act (BWG), Austrian Financial Markets Anti-Money Laundering Act (FM-GwG) and Austrian Beneficial Owner Registry Act (WiEReG)**, as amended. The Austrian laws are designed to be consistent with FATF Recommendations. Furthermore, Money Laundering and Terrorist Financing are a crime in terms of the Austrian Criminal Code.

Further, **Kathrein Privatbank Aktiengesellschaft** has developed and implemented anti money laundering programs and principles that are designed to aim for compliance with the applicable anti-bribery and anti-corruption laws and regulations.

**Kathrein Privatbank Aktiengesellschaft**

- Registration No: FN 144838y
- Supervisory Authority: Austrian Financial Market Authority FMA, Otto-Wagner Platz 5, 1090 Vienna

The following procedures, which have been approved by senior management and are appropriately exercised in compliance with local legal requirements wherever the Kathrein Privatbank Aktiengesellschaft is active, include but are not limited to:

**General Note**

- Board of Management approved AML/Compliance Officer
- Senior Management approved written policies

**Customer Due Diligence – ID Check**

- identification and verification of customers and authorized signatories before

- establishing a business relationship
- identification and verification of customers for transactions amounting or above EUR 15.000,-
- for suspicious transactions
- nature and purpose of business relationship
- identification of ultimate beneficial owner; this also applies for trustees and trustors
- approval of senior management concerning business relationship with PEPs
- no accounts for persons using fictitious names
- no banking services for shell banks
- no payable through accounts

## Risk-based approach

- for customers and products, which also related to country risk and transactions
- enhanced due diligence for high risk category

## Customer Documentation

- record keeping
- records are kept for at least 5 years
- regular updating of customer data

## Transaction Monitoring

- automated transaction monitoring
- plausibility checks of account activities
- analysis of payment corridors
- evaluation of effectiveness of scenarios

## Suspicious transaction reports

- written procedures
- based Compliance/ML risk indicators
- to Austrian/local Financial Intelligence Unit (A-FIU at Federal Criminal Police Office)

## Financial Sanctions

- Kathrein Privatbank Aktiengesellschaft implements all applicable financial sanctions and embargos. For sensitive cases, stricter rules may apply, for example business with Syria or North Korea is not executed

- real time screening of transactions against all applicable lists (EU, UN, OFAC, UK-HMT, local)
- daily screening of existing clients against list of sanctions (EU, OFAC, UK-HMT, local)

### Counter-Fraud and Counter-Corruption

- explicit prohibition of any fraudulent activities as well as bribery and facilitation payments communicated to all employees and published in RBI's Code of Conduct applicable for all entities
- responsibilities assigned for all measures related to corruption prevention
- risk based model for countries, entities and industries
- implementation of consistent counter-fraud and counter-corruption framework including automated reporting mechanisms
- annual control assessment regarding reliability and efficiency of the respective control frameworks
- disciplinary measures in case of breaches
- close and regular information exchange between AML and Counter-Fraud functions
- whistleblowing hotline and other disclosure methodologies in place

### Training

- new employees have to attend AML Training within the first three month of joining **Kathrein Privatbank Aktiengesellschaft**
- annual trainings for employees with direct or indirect customer contact (i.e. relationship manager or sales department)
- trainings are provided in the form of e-learnings and /or classroom trainings depending on necessity and requirements of the employees
- ad hoc trainings
- advanced training sessions
- training communicates at least knowledge about
  - money laundering and sanctions
  - the importance of knowing the customers business and behaviors
  - methods and techniques of money laundering, fraud, bribery and corruption
  - how to detect possible money laundering and fraud
  - setting first proper actions in case of suspicion
- the participation is 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, Financial Sanctions and Counter-Fraud and Counter -Corruption activities, **Kathrein Privatbank Aktiengesellschaft** has

designated a senior official. This Certificate is also valid for **Kathrein Capital Management GmbH**

Upon request we will provide all documents and information, which we may have on our files relating to the identity of each shareholder and underlying beneficial shareholders to the extent permitted by Austrian law. In any event, we will provide a competent Austrian authority with the documentation upon their request and to the extent permitted by Austrian law.

For further information, please see our homepage [www.kathrein.at](http://www.kathrein.at) or please do not hesitate to contact Compliance directly, [compliance@kathrein.at](mailto:compliance@kathrein.at)

Yours sincerely

Miriam Klenner  
Head of Compliance & AML