

# CERTIFICATE

OF

## **Raiffeisen Bank dd Bosna i Hercegovina, Anti-Money Laundering, Financial Sanctions and Counter-Fraud and Counter-Corruption Rules and Regulations**

This is to notify you that **Raiffeisen Bank dd Bosna i Hercegovina** and all its branches and subsidiaries make every effort to remain in full compliance with the AML/CTF Law ("Official Gazette of Bosnia and Herzegovina" nos. 47/14, 46/16), and 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).

Further, **Raiffeisen Bank d.d. Bosna i Hercegovina** 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.

### **Raiffeisen Bank d.d. Bosna i Hercegovina**

- Licence No: 01-49-15/96 from 24.12.1996.
- Registration No: 1-11-629
- VAT Registration No: 200344670009
- Supervisory Authority: Banking Agency of the Federation of Bosnia and Herzegovina

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

### **General Note**

- Supervisory board approved AML/Compliance Officer
- Board Management approved written policies

### **Customer Due Diligence - ID-Check**

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- identification and verification of customers and authorized signatories before establishing a business relationship
- identification and verification of customers for transactions amounting to or above BAM 30.000- approximately € 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 Management Board concerning business relationship with PEPs and correspondent banks
- no accounts for persons using fictitious names
- no banking services for shell banks
- no payable through accounts

### **Risk-based approach**

- for customer industries and products, which is also related to country risk
- enhanced due diligence for high risk category

### **Customer Documentation**

- record keeping
- records are kept for at least 10 years
- regular updating of customer data

### **Transaction Monitoring**

- automated transaction monitoring
- plausibility checks of account activities
- analysis of payment corridors
- screening of unusual, complex and conspicuous transactions
- evaluation of effectiveness of scenarios

### **Suspicious Transaction Reports**

- written procedures
- based on Compliance/ML risk indicators
- to local Financial Intelligence Unit (FOU)

### **Financial Sanctions**

- Raiffeisen Bank d.d. Bosna i Hercegovina implements all applicable financial sanctions and embargoes. 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 RBBH's Code of Conduct and mandatory Group Regulations applicable for all entities
- responsibilities assigned for all measures related to fraud and corruption prevention in Head Office and all subsidiaries with a direct reporting line to the relevant Group function in Vienna
- risk based models for countries, entities, and industries
- implementation of consistent counter-fraud and counter-corruption framework in all entities including automated reporting mechanisms
- annual control assessments 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 3 months of joining **Raiffeisen Bank d.d. Bosna i Hercegovina**
- annual training 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
  - o money laundering and sanctions
  - o the importance of knowing the customers businesses 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
- general employee compliance duties
- the participation is documented for every single employee (name, date of attendance, contents)
- regular verification of quality and efficiency of our policies

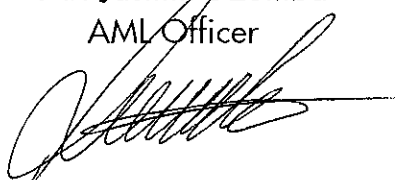
For all Compliance related issues, such as AML, Financial Sanctions and Counter-Fraud and Counter -Corruption activities, **Raiffeisen Bank d.d. Bosna i Hercegovina** has designated a senior official.

This Certificate is also valid for Raiffeisen Bank d.d. Bosna i Hercegovina and all subsidiaries of **Raiffeisen Bank d.d. Bosna i Hercegovina**

For further information, please see our homepage **[www.raiffeisenbank.ba](http://www.raiffeisenbank.ba)** or please do not hesitate to contact **Mr. Jasmin Šlaku, Head of Compliance** [jasmin.slaku@raiffeisengroup.ba](mailto:jasmin.slaku@raiffeisengroup.ba), or **Mr. Jasmin Džomba AML Officer / Deputy Head of Compliance** [jasmin.dzomba@raiffeisengroup.ba](mailto:jasmin.dzomba@raiffeisengroup.ba)

Yours sincerely,

Mr. Jasmin Džomba  
AML Officer



Mr. Jasmin Šlaku  
Head of Compliance

