

## **Memo on the implementation of the Anti-Money Laundering and Counter-Terrorism Financing Policy - AML**

Attica Bank is supervised on a consolidated basis by the Bank of Greece. The Bank of Greece is the authority responsible for supervising compliance with the legislative framework on the prevention and suppression of money laundering and terrorist financing (anti-money laundering and counter-terrorism financing).

**Money Laundering** (hereinafter “ML”) means all the acts or omissions which aim at concealing or disguising the illicit origin of money/funds.

Under Law 4557/2018, as in force, the following are defined as ML crimes:

- the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an activity to evade the legal consequences of that person's action.
- the concealment or disguise of the truth, in any manner or by any means, as it concerns the nature, origin, sale, trafficking or use of property or the place where the property was acquired or is at present, or the ownership of the property or rights with respect to it, knowing that such property is derived from criminal activity or from an act of participation in such activity;
- The acquisition, possession, administration or use of property, knowing at the time of receipt or administration that such property was derived from criminal activity or from an act of participation in such an activity.
- The utilization of the financial sector by placing therein or moving through it proceeds from criminal activities for the purpose of imparting false legitimacy to such proceeds.
- The setting up of an organisation or group of at least two persons, for committing one or more of the above acts and the participation in such an organisation or group.

Law 4557/2018 provides that Money Laundering shall be regarded as such even where the activities which generated the property to be laundered were carried out in the territory of another country, provided that said activities would be a predicate offence if committed in Greece and are punishable according to the law of said other country.

**Terrorist Financing** (hereinafter “TF”) is defined as the facilitation or assistance in the commission of terrorist acts either by a criminal organisation or an individual terrorist through the provision of information or material means or the receipt, collection, disposal or administration of funds in any manner.

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Banking Societe Anonyme Attica Bank, taking into consideration the Bank's solvency and reputation risks and the credibility of the financial system in general, which may potentially be deeply disrupted by the efforts of criminals to conceal the origin of the proceeds from criminal activities or to channel money into terrorism, implements the Anti-money Laundering and Counter-Terrorism Financing Policy (AML) by determining specific procedures and installing appropriate information systems.

The Bank appoints a competent **Managerial Executive** on the matter and his respective deputy, who are responsible for the proper and efficient implementation of the policy.

The key component of the Customer Acceptance Policy is the "Know Your Customer" principle, which is the basis for all Bank Policies and Procedures for the prevention and suppression of money laundering (hereinafter "ML") and terrorist financing (hereinafter "TF") and the most effective measure for the protection of the Bank's reputation and solvency from adverse effects. The Policy provides for collecting and keeping sufficient information on customers for the purpose of:

- Certifying and verifying the identity of customers.
- Evaluating customers' overall economic and transaction profile and further classifying them based in the ML-TF risk.
- Implementing suitable due diligence measures, depending on the economic/transaction profile and the risk category of customers.