

AML / KYC policies

I. General Information

NAME OF ORGANISATION:	Erste Bank Hungary Ltd.	
DATE ESTABLISHED:	01/01/1987 as Mezőbank	
PREVIOUS NAMES, MERGERS:	1996 acquired Agrobank Rt. 1998 name was changed to Erste Bank Hungary Rt. 2004 Postbank and Savings Bank Corporation merged into Erste Bank Hungary Rt. 2006 name was changed to Erste Bank Hungary Nyrt. 2011 name was changed to Erste Bank Hungary Zrt. Privately owned company limited by shares	
LEGAL FORM:	Budapest Metropolitan Court as court of registry	
REGISTERED BY:	Cg. 01-10-041054	
REGISTRATION NO.:	Népfürdő str. 24-26. Budapest H-1138	
REGISTERED OFFICE:	Népfürdő str. 24-26. Budapest H-1138	
HEAD OFFICE:	H-1933 Budapest	
POSTAL ADDRESS:	GIBAHUHB	
SWIFT CODE:	HU10197879	
TAX IDENTIFICATION NUMBER:	www.erstebank.hu	
WEB-SITE:	Hungarian National Bank	
SUPERVISORY AUTHORITY:	Commercial and Retail Banking	
MAIN BUSINESS LINE:	NONE	
FOREIGN BRANCHES OR OFFICES:	NO	
PUBLICLY TRADED:	- Erste Group Bank AG, Vienna 70,00% - European Bank For Reconstruction and Development 15% - Corvinus International Investment Private Limited Company (State Owned Entity) 15%	
MAJOR SHAREHOLDER:		
MEMBERS OF BOARD OF DIRECTORS:	Radován Jelasity László Harmati Krisztina Zsiga Ivan Vondra Tamás Foltányi Alexandra Habeler-Drabek Frederik Silzer dr. János Rudnay Zoltán István Marczinkó Michael Neumayr	chairman - CEO internal member - Deputy CEO internal member - CRO internal member - CFO internal member - COO, CIO external member external member external member external member external member
AML OFFICER:	Name E-mail	Orsolya Kerekes dr. ML_EBH_Compliance@erstebank.hu

II. General AML Policies, Practices and Procedures

Has the country in which the FI is located established Laws designed to prevent money laundering / terrorist financing activities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the FI subject to its parent's AML policy and controls?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the Law require FIs to have procedures for the prevention of money laundering and terrorist financing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have a legal and regulatory compliance program that includes a designated compliance officer that is responsible for coordinating and overseeing the AML program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the AML compliance program approved by the FI's board or a senior committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In addition to inspections by the government supervisors/regulators, does the FI have an internal and/or external audit function or other independent third party that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your FI adhere to the 40 anti-money-laundering recommendations developed by the FATF?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have policies covering relationships with Politically Exposed Persons consistent with world-wide financial services best practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

III. Risk Assessment

Does the FI have a risk focused assessment of its customer base and transactions of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is proper system put in place to track transactions on the basis of risk classification of countries and the FI does not enter into transactions with high risk countries?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

IV. Know Your Customer, Due diligence and Enhanced Due Diligence

Do the Laws and regulations in your country prohibit FIs from opening anonymous accounts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI collect information and assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have procedures to establish a record for each customer noting their respective identification documents and KYC information collected at account opening?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI require full details for outgoing wire transactions, i.e. sender and beneficiary names, address and account number?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds

Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

VI. Transaction Monitoring

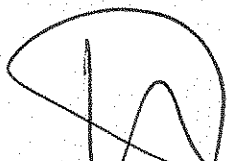
Does the FI have a monitoring program for suspicious or unusual activity that cover funds transfers and monetary instruments (such as traveller checks, money orders, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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VII. AML Training

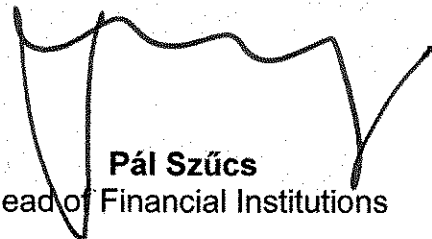
Does the FI provide periodic AML training to relevant employees that includes - identification and reporting of transactions that must be reported to government authorities, - examples of different forms of money laundering involving the FI's products and services, - internal policies to prevent money laundering?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide periodic AML training to relevant agents that includes - identification and reporting of transactions that must be reported to government authorities, - examples of different forms of money laundering involving the FI's products and services, - internal policies to prevent money laundering? Remark: Some functions are carried out by agents, but no AML-relevant functions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

VIII. Correspondent Relationship

Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI assess its correspondents' AML controls? Remark: Only if seated in countries with less strict AML rules than those of the EU.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are all new correspondent relationships approved by a senior manager?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the FI allow direct use of the correspondent account or correspondent sub-account by your customers to transact business on their behalf (i.e. payable-through accounts)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



Orsolya Kerekes dr.
 Head of Legal & Compliance



Pál Szűcs
 Head of Financial Institutions

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