



# **Anti-Money-Laundering Policy of Kommunalcredit Austria AG**

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# **1. Customer identification**

On the one hand, proper identification of customers and their authorised representatives is required in order to comply with the provisions of the Austrian Banking Act (*Bankwesengesetz - BWG*), which contains explicit identification requirements that have been incorporated into this Anti-Money-Laundering (AML) Policy. On the other hand, proper identification of customers and business partners is a matter of diligence and prudence in business and serves to prevent ambiguities regarding the establishment of contracts as well as potential attempts at fraud. Apart from formal requirements, it is therefore essential to bear the overall context in mind and to ensure that any observations made within the framework of customer identification or the preparation of contracts are notified to the anti-money-laundering officer of Kommunalkredit Austria AG (KA) without delay and that further steps to be taken are duly coordinated with the AML officer.

In order to standardise customer identification procedures and to ensure their traceability and verifiability at any time, customer identification forms (Annexes 1 to 5) have to be completed and signed by the customer every time a new customer relationship is initiated (for details, see It. 11 below).

If satisfactory identification is not possible, no business relationship is to be initiated and no transaction is to be made with the customer concerned; the AML officer of KA is to be informed thereof.

## **1.1. Personal identification of the natural person concerned**

When a business relationship is initiated, the identity of the customer or – in the case of a legal person or a natural person not of full legal capacity – the person representing the customer in the transaction in question is to be established, without exception, through personal presentation of an official photo identity document. Copies of an ID document or oral statements are not sufficient.

The official photo ID document must have been issued by a public authority and must contain the following:

- non-exchangeable, identifiable portrait photo,
- name,
- date of birth,
- signature of the person concerned, and
- designation of the issuing public authority.

Documents suited for identification:

- passport,
- identity card or
- driving licence.

A copy of the official photo ID document is to be attached to the file.

As a matter of principle, the customer must be identified prior to conclusion of a contract, but, at the latest, before a transaction is made by the customer or for the customer.

## **1.2. Identification of legal persons**

The following minimum standards apply to both core bank business and depository bank business:

The identity of a legal person has to be checked on the basis of documents of probative value available according to the legal standard commonly applied in the country of domicile of the legal person. In the case of a company, this requirement is met, inter alia, by an up-to-date statement extracted from the register of companies or the national commercial register. For territorial authorities, an extract from the national register of local authorities – if available – is sufficient. The document must be up to date, i.e. if possible not older than 6 weeks, but under no circumstances older than 3 months.

For depository bank business, the following additional information has to be obtained:

- firm / official name (including acronym, if any),
- legal structure,

- country of registration,
- registration authority,
- registration number (if available, e.g. Companies Register number or Central Register of Associations number in Austria),
- objective of the firm,
- first name and family name as well as date of birth of the managing officers, unless already obtained under 1.1.

### **1.3. Establishment of the power of agency**

If a business relationship is to be initiated with legal persons, the power of agency of the person acting on behalf of the legal entity must also be checked on the basis of appropriate documents. Besides the abstract power of agency (e.g. the mayor), the specific power of agency (e.g. the person holding office as mayor) must also be established.

In the case of Austrian local authorities, this requirement can be met, depending on the local government bylaws, by a certificate issued by the local government supervisory authority, the executive director of the local authority or the administrative authority of the district concerned. In the case of foreign territorial authorities, the legal provisions of the country concerned must be taken into account. In case of doubt in a particular case, the AML officer is to be consulted.

In the case of companies, an up-to-date statement extracted from the register of companies, showing the persons currently holding power of agency, is to be regarded as adequate.

### **1.4. Disclosure of trustee relationships**

Anybody carrying out banking transactions for another person without acting as that person's representative is deemed to be a trustee for the purposes of this AML Policy. Therefore, the customer must be requested to indicate if he/she intends to perform the transaction and/or engage in the business relationship on his/her own account or on somebody else's account (trustee). If the customer intends to act as a

trustee, his/her own identity is first to be established on the basis of his/her official photo ID document (see It. 1.1).

**Important:** The trustee must be physically present when his/her identity is established. Identification of the trustee by third parties or within the framework of remote banking is not permissible.

Moreover, the trustee has to obtain proof of the identity of the trustor either personally or through reliable sources of information (courts, public authorities, notaries public, lawyers, credit institutions) and present a written statement thereon to the credit or financial institution.

The trustee has to offer proof of the identity of the trustor to the credit or financial institution.

In core bank business, proof of identity of the trustor - if the trustor is a natural person - has to be provided through presentation of a copy of the official photo ID document of the trustor (see above). If the trustor is a legal person, proof of identity has to be provided through documents of probative value (see above).

In depository bank business, proof of identity of the trustor - if the trustor is a natural person - has to be provided through documents of probative value (see above) and a photo ID document of his/her representative (see also above). Natural persons are not accepted as trustees by KA.

## **1.5. Determination of the beneficial owner**

The customer is to be asked to disclose the identity of the beneficial owner of the customer. The information provided by the customer as well as the identity of the beneficial owner is to be checked by suitable means (e.g. register of companies and/or national commercial register). The "beneficial owner" is deemed to be the natural person(s) who own(s) or control(s) the customer or the legal person and/or the natural person on whose behalf a transaction or activity is carried out.

In this context, disclosure of the persons / companies concerned is sufficient; copies of identity documents are not required.

These are:

a) in the case of companies:

i) the natural person(s) owning or controlling a legal person through his/her (their) position of directly or indirectly holding or controlling a sufficient number of shares or voting rights. Bearer shares are to be taken into consideration for this purpose. Holding 25% plus one share is deemed to be sufficient to meet this criterion;

ii) the natural person(s) exercising control over the management of a legal person by other means;

b) in the case of other legal persons, such as foundations, and legal structures, such as trusts for the administration or distribution of funds:

i) if the future beneficiaries have already been determined, the natural person(s) who is (are) the beneficiary (beneficiaries) of 25% or more of the assets of a legal structure or legal person;

ii) if the individuals who are the beneficiaries of a legal structure or legal person have not yet been determined, the group of persons in whose interest the legal structure or legal person takes effect or has been established;

iii) the natural person(s) exercising control over 25% or more of the assets of a legal structure or legal person.

As a result of the verification of the beneficial owner of a legal person, the ownership and/or control structure of the latter must be known beyond any doubt.

c) Listed companies the securities of which are traded in a regulated market and which are subject to the disclosure requirements of EU legislation and/or equivalent international standards are exempted from this requirement.

## **1.6. Identification of the purpose and type of the intended business relationship**

The customer is to be requested to disclose the intended purpose of the business relationship.

In core bank business, the customer is to be requested to disclose the intended purpose of the business relationship, which is to be reviewed for its plausibility. If a customer identification form according to Annex 1 is used, the purpose of the relationship must be indicated therein. If the purpose and type of the transaction do not appear sufficiently plausible, the planned transaction is to be classified as an unusual transaction and the AML officer is to be informed.

In depository bank business, the intended purpose of the business relationship is to be reviewed for its plausibility; moreover, any purpose indicated by the customer other than “investment of customer assets” is to be documented.

Moreover, the origin of the assets is to be explored and documented in the corresponding form, if

- a) a customer identification form is to be signed by the customer (legal person – Annexes 2 and 3 / private customer from non-EEA state – Annex 4) or
- b) if the first deposit and/or the market value of the securities transferred exceeds EUR 500,000.

## **1.7. Consequences of missing identification or information**

If the customer cannot be duly identified in accordance with the provisions of the law and/or if the required information cannot be obtained, the AML officer is to be informed without delay.

In compliance with Sect. 40.2.d of the Austrian Banking Act, the performance of the transaction and/or the establishment of the business relationship are to be refused, if the anti-money-laundering provisions of the Austrian Banking Act cannot be met.

Existing business relationships are to be terminated, if the obligation to identify the customer and/or to obtain the required information cannot be met.

Moreover, the AML officer is to be informed without delay of any failure to identify a customer and/or to obtain the required information. It is then up to the AML officer to decide on the basis of the legal provisions if the case is to be notified to the money-laundering reporting authority and to effect such notification, if required.

## **1.8 Record-keeping**

All documents serving for customer identification according to Items 1.1 to 1.7 are to be kept and preserved in the customer file for a period of at least five years after termination of the customer relationship with the customer concerned.

Records of all transactions are to be kept and preserved for a period of at least five years after the transaction.

To avoid potential conflicts with the obligation to keep and preserve records under commercial law, a period of seven years is to be observed internally in both cases in depository bank business.

## **2. Customer identification in remote banking**

### **2.1. General remarks**

Remote banking is defined as a transaction in which the customer or – in the case of legal persons – the natural person holding power of agency for the customer is not physically present for identification and personal presentation of an official photo ID document is therefore not possible.

Instead of physical customer identification according to Item 1.1, alternative procedures according to the following Items 2.2 to 2.5 are permitted. However, it is understood that the requirements of Items 1.2 to 1.8 also apply within the framework of remote banking!

In the case of a trustee relationship, identification of the trustee via remote banking is not possible. The trustee must be physically present for identification.

## **2.2. Customer identification in remote banking relationships with customers within the EEA**

Within the framework of remote banking relationships with customers within the EEA, the following procedure, instead of the procedure outlined in Item 1.1, is to be applied:

- a. the legally valid statement by the credit or financial institution must be made in writing and served by registered mail to the customer address indicated as the customer's domicile; the requirement of service by registered mail may be waived if the customer's signature is obtained as a qualified digital signature according to Sect. 2.Z.3a of the Digital Signature Act;
- b. the name, date of birth and address of the private customer and/or the business name and domicile of the legal person must be known;
- c. in the case of legal persons: the customer must submit a written statement confirming that the domicile is also the principal place of business;
- d. a copy of the official photo ID document of the customer (in the case of natural persons) or the person holding power of agency (in the case of legal persons) must be available at the time of conclusion of the contract.

## **2.3. Customer identification in remote banking relationships with customers outside the EEA (including Switzerland!)**

If the customer's domicile or residence is outside the EEA, the following requirements, in addition to the requirements under Item 2.2, must be met:

- a. presentation of a written statement by another credit institution with which the customer has a permanent business relationship confirming
  - aa. that the customer was duly identified (as required under the EU Money Laundering Directive) and
  - ab. that the permanent business relationship is an active relationship;

if the confirming credit institution is domiciled in a third country, the requirements to be met in that third country must be equivalent to the requirements of Articles 16 to 18 of the above mentioned Directive;

- b. instead of identification and confirmation by a credit institution, identification and written confirmation by an Austrian diplomatic mission in the third country concerned or by a recognised certifying body is permissible.

## **2.4. Alternative means of customer identification in remote banking**

Alternatively to the procedures outlined in Items 2.2 and 2.3, the following procedure can be applied in cases in which the first payment within the framework of the transaction is cleared through an account opened in the customer's name with a trusted third party (see Item 3), provided the customer has been duly identified in accordance with the above standards:

- a. name, date of birth and address of the private customer and/or the company name and domicile of the legal person must be known; the domicile of the legal person must also be the principal place of business;
- b. copies of customer documents must be available, on the basis of which the information provided by the customer and/or the natural person holding power of agency regarding the identity of the customer and/or the natural person holding power of agency can be plausibly verified;
- c. instead of such copies, a written confirmation by the credit institution through which the first payment is to be made stating that the customer has been duly identified under the Money Laundering Directive in accordance with the requirements of Item 1.

## 2.5. Procedures applied by KA in its public finance business

Within the framework of KA's public finance business, borrowing customers with remote banking relationships are identified prior to loan disbursement, at the latest, by the following procedure:

- a. in the case of companies: establishment of the name of the company, its domicile and the person holding signatory power on the basis of an extract from the register of companies; confirmation by the customer that the domicile is also the principal place of business (as provided for in the standard loan contract form);
- b. in the case of foreign territorial authorities and other public authorities: establishment of the legal personality of the authority, its seat and the person holding signatory power by means of suitable documents (depending on national conditions: extract from a national register, local government bylaws, legal texts, etc.); confirmation that the seat is also the principal place of business is not required.
- c. in the case of domestic territorial authorities and other public authorities: establishment of the persons holding signatory power by means of suitable documents; establishment of the legal personality and the seat of the authority by means of suitable documents (local government bylaws, provincial act) is only required in case of doubt;
- d. prior to conclusion of the contract, but at the latest prior to disbursement: obtaining a copy of the official photo ID document of the persons holding power of agency signing the contract;
- e. a legally valid statement by KA must be made in writing and delivered to the seat or principal place of business by registered mail;
- f. in the case of customers outside the EEA: disbursement exclusively to one or several accounts opened with another credit institution (see Item 3) in the

customer's name; prior to disbursement, written confirmation thereof must be obtained from the customer (as provided for in standard loan contract form).

## **2.6. Procedures applied by KA in depository business**

Within the framework of KA's depository business, borrowing customers with a remote banking relationship are identified by the following procedure:

- a) legal persons (e.g. companies): establishment of the name of the company, its domicile and the person holding signatory power on the basis of an extract from the register of companies; confirmation by the customer that the domicile is also the principal place of business (as provided for in standard customer identification form 2 and/or 3):
- b) private individuals: establishment of name, date of birth, address (place of residence);
- c) prior to conclusion of the contract, but at the latest prior to a transaction: obtaining a copy of the official photo ID document of the persons holding power of agency signing the contract (in the case of legal persons) and/or the customer (private individual);
- d) a legally valid statement by KA must be made in writing and delivered to the principal place of business or to the place of residence by registered mail; if service by mail is not possible after two attempts, the distribution partner in charge is to be contacted and the reasons given are to be entered in the customer file; moreover, it is to be ascertained without delay if the principal ordering the first transfer is identical with the account holder; in case of doubt regarding the validity of the reasons indicated, the AML officer is to be consulted;
- e) customers outside the EEA: first deposits must be transferred exclusively from one or several accounts opened with another credit institution in the customer's name (see Item 3); prior to the first transaction, a written

confirmation is to be obtained from the customer (as provided for in standard customer identification form 4, Item 6). If this is not possible, the procedure according to Item 2.3 is to be applied; if this is not possible either, the application is to be refused.

### **3. Identification by means of trusted third parties**

The identification of customers by means of trusted third parties is also permitted. The responsibility for satisfactory and correct identification, i.e. for compliance with the anti-money-laundering provisions, remains with KA, even if the third party is also subject to appropriate anti-money-laundering provisions.

Therefore, it is to be ensured that the trusted third party transmits any information to be obtained from the customer on the basis of this AML Policy to KA without delay. Transmission of the completed customer identification form (Know-your-customer form) by the third party to KA is recommended, although this is not the only possible form of transmission.

Moreover, it is to be ensured through a contractual provision that the trusted third party provides the relevant copies of data relating to the establishment and verification of identity without delay upon KA's request.

The following types of companies, provided they are supervised by their national authorities and subject to anti-money-laundering provisions comparable with those of the Austrian Banking Act, are deemed to be trusted third parties:

- a. credit institutions
- b. leasing companies
- c. insurance companies
- d. brokers and dealers in securities
- e. insurance brokers
- f. investment funds
- g. branch establishments of companies listed under a to f in EEA countries.

## 4. Transactions with other credit institutions

The requirements of Item 1 do not apply to:

- Austrian credit institutions: the list of approved credit institutions published on the homepage of the Austrian Financial Market Supervisory Authority (FMA) can be consulted to ascertain if the credit institution concerned is an Austrian credit institution:

<http://www.fma.gv.at/cms/site//attachments/5/8/7/CH0217/CMS1139252919468/ki-liste2746deutsch.pdf>

- Austrian financial institutions: according to Sect. 1.2 of the Austrian Banking Act, financial institutions include, in particular, leasing companies. Austrian financial institutions do not require a licence issued by the FMA, which means that there is no list of approved institutions. Hence, other adequate means have to be employed to ascertain if the financial institution in question is an Austrian financial institution.
- Credit institutions domiciled in another EEA member state: the list of approved credit institutions on the homepage of the European Central Bank (ECB) can be consulted to ascertain if the credit institution in question is an EEA credit institution:

<http://www.ecb.int/stats/money/mfi/list/html/index.en.html> (Link to ECB: [www.ecb.int](http://www.ecb.int))

- Credit or financial institutions domiciled in a third country: third-country credit institutions are defined exclusively as institutions subject to a level of supervision comparable to that provided for in the Austrian Banking Act and whose business activity consists in taking in deposits or other repayable funds from customers and in granting loans on their own account.

If there is any doubt as to whether the customer concerned belongs to any of the above categories of companies, the AML officer is to be consulted.

## 5. Involvement of politically exposed persons (PEPs)

If the above customer identification procedures provide an indication of the involvement of politically exposed persons (PEPs) from countries other than Austria, the AML officer is to be informed without delay and further steps are to be agreed upon.

In this context, involvement refers to actions by a PEP not in his/her official function, but privately or as the representative of a legal person other than that from which his/her PEP status derives.

PEPs are defined as natural persons holding, or having held until one year ago, important public offices in a country other than Austria, and their close relatives or persons known to be closely associated with them.

Important public offices are understood to be the following functions exercised in countries other than Austria:

- a. heads of state, heads of government, ministers, deputy ministers and state secretaries;
- b. members of parliament;
- c. members of supreme courts, constitutional courts or other high-level judicial institutions (courts of last instance);
- d. members of courts of audit or members of the governing boards of central banks;
- e. ambassadors, chargés d'affaires or high-ranking military officers;
- f. members of managing boards and supervisory boards of public-sector enterprises.

The above items a to e also apply to positions at European Union level and positions with international organisations.

If there is any doubt as to whether the person concerned is a PEP, the AML officer is to be consulted. Upon establishment of a business relationship with companies from non-EEA states, the names of the managing and supervisory board members must

be routinely communicated to the AML officer in due time before conclusion of the contract so that any PEP involvement can be established.

## **5.1. How to deal with transactions with PEP involvement**

Business relations with PEPs are not forbidden, but are subject to more stringent requirements regarding pre-contract identification and continuous monitoring:

- a) within the framework of the approval procedure, explicit reference is to be made to any PEP involvement and an opinion expressed by the AML officer is to be attached;
- b) the origin of the assets invested by the PEP or the origin of funds used for interest payments and capital redemption, e.g. in the context of a financing transaction, is to be demonstrably verified;
- c) the business relationship is to be subject to continuous intensified scrutiny; within the framework of financing transactions, special attention is to be paid to early repayment of large amounts and the origin of the funds used for this purpose is to be verified.

## **6. Correspondent banks from third countries**

As regards cross-border relationships with correspondent banks from third countries, the following additional requirements have to be met:

- a) the information obtained about a correspondent bank must be sufficient to permit a complete understanding of the type of business activity it is engaged in and to assess its reputation and the quality of supervision on the basis of publicly available information;
- b) the checks performed and measures taken by the correspondent bank to combat money laundering and terrorist financing must be reviewed at least on a basic level;
- c) before initiating a new correspondent banking relationship, management approval must be obtained;

- d) the heads of the individual fields of business of each correspondent bank must be documented (e.g. annual report);
- e) in the case of “payable-through accounts” it must be ascertained that the correspondent bank has verified the identity of customers having direct access to the accounts of the correspondent bank, that these customers are subject to continuous monitoring, and that the correspondent bank is able to produce the appropriate data regarding its customer due diligence measures upon the request of the first institution.

Any bank maintaining an active business relationship with KA is deemed to be a correspondent bank in this context.

## **7. Shell banks**

A shell bank is a credit institution or other institution performing equivalent activities without having a physical presence in the country in which it was established, thus being subject to neither management nor administration in the true sense of the term; it is not affiliated with a regulated group of financial institutions.

Initiating or maintaining a correspondent banking relationship with a shell bank is forbidden by law. Before a correspondent banking relationship is established, the possibility of the correspondent bank being a shell bank must be excluded. Moreover, business relationships must not be established or maintained with a credit institution which is known to allow its accounts to be used by a shell bank.

## **8. Unusual transactions**

Unusual transactions are defined as transactions

- which do not yet give rise to a justified suspicion of money laundering or terrorist financing,
- but which are unusual as such (amount, type, parties involved) or framed in an unusual manner (overly complex, timing) and

- for which the customer failed to provide a plausible explanation when asked to specify the purpose of the transaction.

The account manager in charge has to inform the AML officer in advance of any unusual transaction and to coordinate the further procedure with the ALM officer.

## **9. Suspicious transactions**

Suspicious transactions are defined as transactions giving rise to a justified suspicion:

- that the purpose of the transaction is money laundering or terrorist financing, or
- that the customer has violated his/her obligation to disclose trustee relationships, or
- that the customer is a member of a terrorist group.

The account manager in charge has to inform the AML officer in advance of any suspicious transaction as well as any attempt to carry out a suspicious transaction and coordinate the further procedure with the ALM officer.

Pending clarification of the facts of the case, no further transaction is to be made, unless it is explicitly approved or ordered by the AML officer.

If the AML officer arrives at the conclusion that the suspicion is justified, he/she has to notify the money laundering reporting authority and inform it of the customer and the transaction concerned in accordance with Sect. 41 of the Austrian Banking Act.

If an offence is reported to the law enforcement authorities, all staff members are under an obligation of secrecy in respect of both third parties and the customer.

## **10. Country risk policy – Country-of-domicile rule**

The type and scope of the procedures applied to prevent money laundering and terrorist financing also depend on the country of domicile and/or centre of economic activity (from 90% of total revenues) of the customer or potential customer.

As regards money laundering and other compliance risks, two types of states are distinguished:

- Member states of the EEA
- Non-member states of the EEA.

As regards customers domiciled in a non-EEA state, the following applies:

- Prior to the establishment of any business relationship, the AML officer is to be consulted. (Transmission of customer information and/or copy of application by e-mail).

As regards customers domiciled in an EEA state, the following applies:

- No additional requirements. The AML officer is to be consulted only in the case of unusual or suspicious transactions.

## **11. Customer identification form**

### **11.1. Core bank business**

For the purpose of documenting compliance with the anti-money-laundering provisions in the conduct of core bank business and for use as an internal checklist, the account manager in charge has to complete a customer identification form (Annex 1) for every customer to be identified in accordance with the bank's AML Policy prior to approving a transaction subject to a duty of identification. Territorial authorities as customers are exempted from this provision.

The completed customer identification form is to be attached to the file. If the answer to one or several questions in fields B to E is no, the customer identification form has to be transmitted to the KA AML officer with a request for comments. These comments are to be attached to the application for approval of the transaction.

Exceptions: if the customer is a territorial authority, use of the customer identification form may be waived.

## **11.2. Depository bank business**

For the purpose of documenting compliance with the anti-money-laundering provisions in the conduct of depository bank business, a customer identification form (generally required for legal persons as well as natural persons from non-EEA states) is to be obtained from the distribution partner in charge, or a purely internal checklist (for natural persons from EEA states) is to be completed, for every customer to be identified in accordance with the bank's AML Policy prior to approving a transaction subject to a duty of identification.

For business relationships with legal persons (companies, entities under public law, territorial authorities) the corresponding customer identification forms 2 (EEA) and 3 (non-EEA) (Annexes 2 and 3) are to be completed and signed by the customer for confirmation.

For business relationships with natural persons from EEA states, use of the internal checklist (Annex 5) instead of the customer identification form is sufficient. If the customer comes from a non-EEA state, customer identification form 4 (Annex 4) is to be signed by the customer.

The completed customer identification form is to be enclosed with the customer file.

The customer identification form is to be transmitted to the KA AML officer with a request for written comments, if

- a) the customer fails to provide the required information or the information provided is obviously incomplete;

- b) the customer is a politically exposed person (Item 5 of the customer identification form);
- c) the customer is domiciled in a non-EEA state, or
- d) there are other grounds for the assumption that the intended transaction might serve for money laundering or terrorist financing or be detrimental to the reputation of KA.

The written comment by the AML officer is to be attached to the customer file.

## **12. Anti-Money-Laundering Officer**

### **12.1. Function**

An anti-money-laundering officer with clearly defined functions has been appointed at KA. The AML officer is to be contacted in all matters (precautionary measures, suspicious cases) relating to money laundering and terrorist financing.

### **12.2. Tasks**

- Regular information of staff members
- Establishment of risk-related supervisory measures for the protection against money laundering and terrorist financing
- Regular sample checks to verify compliance with the provisions of the AML Policy
- Regular training of all staff members regarding the legal requirements to be met in the context of money laundering and terrorist financing
- Verification that the bank's internal anti-money-laundering rules and procedures meet the legal requirements

- Monitoring of the risk profile of KA and, if necessary, adaptation of the bank's internal procedures for the prevention of money laundering and terrorist financing
- Review and, if appropriate, implementation of publications and warnings transmitted to KA by the Austrian Bankers' Association
- Review and, if appropriate, implementation of the legal requirements and/or circulars and recommendations of the FMA relating to the prevention of money laundering
- If provided for and/or required, communication with the money laundering reporting office and verification that its orders are followed within KA
- Other tasks derived from this AML Policy (e.g. regarding the involvement of the AML officer in questions arising from the customer identification form).

### **13. Scope**

The requirements laid down in this AML Policy reflect the legal requirements to be met by KA.

This AML Policy is to be observed and complied with by all staff members of KA.

If KA delegates any of the tasks derived from the AML Policy to other persons or companies, it is to be ascertained that such persons or companies are aware of and comply with the requirements laid down in this AML Policy. The responsibility for compliance with the legal requirements remains with KA.

## **14. Annex**

### **14.1. For core bank business**

Annex 1: Customer identification form 0 – Core bank

### **14.2. For depository bank business**

Annex 2: Customer identification form 1 – Legal persons from EEA states

Annex 3: Customer identification form 2 – Legal persons from non-EEA states

Annex 4: Customer identification form 3 – Private customers from non-EEA states

Annex 5: Checklist for private customers from EEA states