

Group Customer Acceptance Policy

1. PURPOSE AND SCOPE OF POLICY

The purpose of this Policy is to provide guidance and clarity on customer acceptance and to ensure compliance with all applicable legal and regulatory requirements.

The Policy applies to the BoC Group.

The BoC, as a minimum, meets the requirements set out in this Policy. In any country where the requirements of applicable law(s), directives or practices establish a higher standard, BoC Group meets those standards. In the case where current local laws conflict with this policy, the respective local Compliance/AML Unit liaises with the AMLCO of the parent company of the Group, to resolve the issue.

All BoC Group entities are expected to enact in their own internal systems equivalent procedures.

2. ABBREVIATIONS

Within this document, the following abbreviations are used:

Abbreviation	Definition
AC	Audit Committee
AML/CTF	Anti-money Laundering / Combating Terrorism Financing
AMLCO	Anti-Money Laundering Compliance Officer
BIS	Bureau of Industry and Security
BoC	Bank of Cyprus Public Company Ltd
BoC Group	Bank of Cyprus Public Company Ltd and its subsidiaries
BoC Group Entities	Bank of Cyprus Public Company Ltd subsidiary
CAP	Customer Acceptance Policy
CBA	Cyprus Bar Association
CBC	Central Bank of Cyprus
CPI	Corruption Perceptions Index
CySEC	Cyprus Securities and Exchange Commission
EEA	European Economic Area
EU	European Union
ExCo	Executive Committee
FATF	Financial Action Task Force
FCSCD	Financial Crime Sanctions Compliance Department
FIU	Financial Intelligence Unit
FSI	Financial Stability Institute
ICAAP	Internal Capital Adequacy Assessment Process
ICPAC	The Institute of Certified Public Accounts of Cyprus
ID	Identification Document
ML/TF	Money Laundering / Terrorism Financing

OECD	The Organisation for Economic Co-operation and Development
OFAC	Office of Foreign Assets Control
PEP	Politically Exposed Person
UN	United Nations

3. GENERAL PRINCIPLES

3.1 Customer Acceptance Principles

The evaluation of a customer’s risk is fundamental to the BoC’s effort to prevent and suppress money laundering, terrorist financing, sanctions violations and other illegal activities.

The BoC reserves its right to deny the establishment of any business relationship with a person (physical and/or legal) assessed to fall within the groups of not accepted customers described below or indeed if for any reason the BoC is uncomfortable with the establishment of a business relationship.

The BoC Customer Acceptance Policy (“CAP”) is designed to ensure that BoC Group adequately assesses prospective and existing customers from an AML/CTF/Sanctions Compliance perspective to ensure that it establishes and maintains relationships with customers with no ML/TF/Sanctions relationships or transactions. In parallel, the CAP covers areas outside BoC’s risk appetite, where a business relationship cannot be accepted.

In the case of vendors, the same principles apply.

3.2 Customer Risk Assessment Scorecard

BoC adopts the use of a scorecard to determine the risk level of prospect and current customers. The scorecard uses various criteria such as:

- Geography Risk Factors:** Scoring is allocated based on the geographical risks associated with each customer. If the entity is an individual, then s/he is scored for both his/her ID/Passport Country and his/her Country of Residence. In the case of a legal entity, several factors are considered, including the legal entity’s Country of Registration and Country of Economic Activity, as well as the Country of Residence and the Country of ID/Passport of all its Ultimate Beneficial Owners, Shareholders, Directors, and Signatories.
- Destination / Origin of Wire Transfers:** Scoring is allocated based on the geographical distribution of the customer’s wire transfer activity.
- Transactional Risk Factors:** Scoring is allocated based on the total turnover (Debit or Credit) of the customer.
- Customer Risk Factors:** Scoring is allocated based on certain characteristics associated with the customer. In the case of individuals, scoring is allocated in the case the customer is a PEP/PEP related, if they are associated with Negative Media, or if they are sole proprietors with heavy cash business. In the case of legal entities, scoring is allocated in the case the legal entity is associated with a PEP, in the case the legal entity is associated with Negative Media, in the absence of audited accounts, in the case the legal entity is part of a complex structure, if nominee shareholders are included in the legal entity’s structure, or in the case the business is associated with heavy cash turnover.
- Product Risk:** Scoring is allocated based on the type of products the customer has. Certain products such as investment portfolios and respondent accounts carry a higher risk score.

6. **Distribution Channel Risk:** Scoring is allocated based on the method of onboarding the customer.
7. **Behavior Risk Factors:** Scoring is attributed based on several behavioral aspects of the customer such as the need to monitor the customer's transactions, number of inquiries received from Correspondent BoCs for the customer, or whether there is a significant deviation between the customer's established declared turnover in his/her BoC accounts, compared to the actual.
8. **Employment Type:** The customer's employment type is considered for the scoring.
9. **Industry Factors:** The industry in which the customer is involved is considered for the scoring.
10. **Legal form:** If the customer is a legal entity or a legal arrangement, the type of the legal entity / arrangement is considered for the scoring.

The above criteria are used in combination to determine the risk level of each customer. Customers, based on the score reached by their characteristics, are categorized as:

1. Not Accepted (see Appendix 1)
2. Critical Risk / High Risk (see Appendix 2)
3. Significant Risk
4. Moderate Risk
5. Low Risk

Depending on each risk category, different due diligence measures are required. Simplified due diligence measures are required for Low-Risk customers, Normal due diligence measures are required for Moderate Risk customers and Enhanced Due Diligence measures are required for Significant and Critical/High Risk customers. Higher charges / rates may apply to customers for whom Enhanced Due Diligence measures are applied.

3.3 List of conditions under which a business relationship with an existing client is terminated

BoC may terminate a business relationship with an existing customer if any of the following conditions applies:

1. If they are introduced by an approved professional intermediary and a subsequent meeting did not take place with BoC staff.
2. If, during the review / customer update process, the customer fails or refuses to provide vital information requested by the BoC.
3. If a court order by the local authorities was/is issued against a customer, resulting in an unacceptably increased ML/TF risk associated with the customer.
4. If the customer's activities change, and the new activities fall within the BoC's non-accepted types of business.
5. If a customer was/is convicted for any serious predicate offence.
6. If a customer attempts to deceive the BoC.
7. If the customer or, in the case of a legal entity, any of its directors, shareholders, beneficial owners, or signatories is added on sanctions lists issued by the EU, UN or OFAC or BIS Lists, then, existing business relationships are treated according to the provisions of the Group Sanctions Policy.

If the BoC has reasonable grounds to believe that the customer is involved in money laundering or terrorism financing activities, then all necessary measures are considered, including the termination of the business relationship, subject to the directions of the local FIU.

3.4 Approval and Annual Review

The policy is approved by the Board of Directors through the Audit Committee.

The policy is reviewed at least annually by the Compliance Division and any amendments are submitted to the Audit Committee for approval.

4. GOVERNANCE

Role	Final
Board of Directors	<ul style="list-style-type: none"> Bears the ultimate responsibility for the effective implementation of the Policy and for setting the right tone from the top. Approves the Policy. Approval of Customer Acceptance Policy deviations in case of escalation by the Customer Acceptance Committee.
Audit Committee	<ul style="list-style-type: none"> Recommends the Policy for approval (to the Board of Directors). Makes sure that sufficient, dependable, and secure internal procedures are in place to ensure that the Group complies with the policy. Monitors the effective implementation of the Policy via the Control Functions.
Customer Acceptance Committee	<ul style="list-style-type: none"> Approves deviations of the Customer Acceptance Policy. Escalates to the BoD deviations as deemed necessary.
ExCo	<ul style="list-style-type: none"> Reviews the Policy prior to submission to the AC. Ensures that it is effectively embedded throughout the Group's operations.
Compliance Division	<ul style="list-style-type: none"> Has the overall responsibility for the drafting and enforcing the policy. Prepares and updates relevant procedures/circulars as required. Organizes and conducts relevant training for all staff. Carries out monitoring reviews to assess the effective implementation of the Policy and recommends corrective action where required.
Risk Management Division	<ul style="list-style-type: none"> Reviews and assesses the compliance risks addressed in the policy, ensuring that the risks undertaken are within the BoC's risk appetite.
Internal Audit Division	<ul style="list-style-type: none"> Responsible for providing independent and objective assurance to the BoD, through the AC, and to management, by assessing the effectiveness of governance, risk management, and control processes related to this policy. Informs AC of its findings and relevant recommendations.

5. EXCEPTION APPROVAL PROCESS

In cases where there is a request for deviation from this policy, which:

1. is fully justified,
2. does not violate the legal/regulatory framework, or constitutes a significant moral lapse, nor does it constitute a significant reputational risk for the BoC, and
3. has the approval of the Customer Acceptance Committee. The Customer Acceptance Committee, on its discretion, may escalate a deviation for final approval to the Board of Directors.

The Audit Committee to be notified of any comments and confirmation of the deviation.

6. IMPLEMENTATION PROCEDURES (KEY PROCESSES)

The BoC Group has in place written well documented and detailed procedures for the implementation and monitoring of this policy. The policy is communicated to all staff as to mitigate any resulting compliance risks.

The procedure also acts as an internal alert and:

1. Provides guidance as to the necessary information to help examine/assess a case.
2. Ensuring that the potential or actual breaches raised are assessed and escalated in a timely manner.
3. Ensures the tracking of the outcome and monitoring of mitigation actions.
4. Ensures appropriate record keeping.

Systems and processes are adjusted accordingly, and staff is adequately trained to support effective implementation and monitoring of compliance with the policy.

Appendix 1 - Examples of Entities (Individuals or Legal Entities), Accounts, or Transactions Not Accepted by BOC and related entities

Important Notes:

1. BOC Group deems that the risk associated with certain groups of customers is unacceptably high and has, therefore, decided not to establish a business relationship with them. In the case of vendors, the same principle applies. Apart from the requirements of the Law and the Directive, the BoC, as part of its Risk Appetite Assessment, has included in this category other types of customers based on the ML / TF risk associated with them.
2. The categorization of a customer as Not Accepted is based on the overall score assigned by the automated scorecard, considering all risk parameters. To that effect, the below list is not an exhaustive list of Not Accepted customer types.
3. For Countries Categorization, please refer to Appendix 3.
4. The automated scorecard incorporates parameters / examples as described below which can be implemented systemically. To that effect, some of the below parameters / examples, which cannot be implemented systemically, are also considered in the overall risk assessment of clients.

An Entity/Client is considered Not Accepted if it:

1. Carries out illegal activities, including specific human rights violations (such as drug dealing, fraud, human trafficking, slavery, forced labor, prostitution, child pornography, pedophilia, etc.)
2. Is convicted for a crime considered as a predicate offence, as prescribed by the relevant Law in each jurisdiction.
3. Fails to provide adequate identification information or to disclose its financial operations.
4. Is a shell company¹, a shell BoC or a BoC which deals with shell BoC or shell companies.
5. Is a terrorist or deals with terrorist activities (such as financing terrorist activities etc.)
6. Requests to have accounts in the name of anonymous or fictitious persons.
7. Is from /carries out transaction with a political regime not recognized by the United Nations.
8. Is subject to specific sanctions (i.e. EU, UN, OFAC, OFSI, local lists), including close family members, close associates and related entities (irrespective of the percentage of ownership, either direct or indirect, held by the entities subject to sanctions).
9. Is added on the US Department of Commerce's Bureau of Industry and Security Lists or is an entity owned 50% or more, directly or indirectly, by an entity on the BIS Lists.
10. Is an Entity designated under Sectoral Sanctions (including related entities).
11. Is acting on behalf of or dealing/trading with any sanctioned person or is involved in any sanctioned activity.
12. Is an individual customer whose Country of Residence is a Country included in Categories A, A1 or A2. Existing customers remain until final closure of accounts is possible.
13. Is an individual customer whose ID / Passport Country is a Country included in Category A.
14. Is a legal entity whose Country of Registration or Country of Economic Activity is a Country included in Categories A, A1 or A2.

¹ Refer to OC151 regarding the definition and procedures which is followed.

15. Is a legal entity where the Country of Residence of any of its Directors, Signatories, Shareholders (=>25%) or Beneficial Owners (=>25%) is a Country included in Categories A, A1 or A2. Existing customers remain active until final closure of accounts is possible.
16. Is a legal entity where the Country of ID / Passport of any of its Directors, Signatories, Shareholders (=>25%) or Beneficial Owners (=>25%) is a Country included in Categories A and A1. Existing customers remain active until final closure of accounts is possible.
17. Is a legal entity with bearer shares or has a provision to issue bearer shares.
18. Is a customer who falls under the following categories:
 - a. Is a non-face to face customer² from,
 - b. Is a trust established in,
 - c. Is a Foundation for business or private purposes registered in,

Category A, A1, A2 or B Countries.

An exception can be provided, with the approval of the AMLCO, for cases where the client's group³ structure, leading to the BNO, contains a trust established in a category B country.
19. Is a Politically Exposed Person (PEP)⁴:
 - a. From Category A, A1 or A2 Country, Russia or Belarus as per paragraph 25 (currently under Category B)⁵
 - b. From other Category B countries (for new customers)⁵
 - c. From Ukraine (for new customers)⁵
 - d. For whom the source of wealth cannot be determined or the reasoning for establishing a business relationship is not clear.
20. Is a trust:
 - a. Which is governed by the Cyprus Legal framework but is not registered in the Cyprus Register of Trusts, or
 - b. Whose ultimate beneficial owners are not determined (discretionary trust), or
 - c. Whose purpose is not compatible with the business activity/economic profile of the account holder, or there is no legitimate economic reason for its establishment.
21. Operates in the following high-risk industries and is not regulated/licensed in a Category F Country: (a) Casinos, (b) Betting Houses, (c) Prize Competitions, (d) Financial Services Firms, or Brokerage Firms⁶ (e) Banking or Insurance Institutions, (f) Armed Security Services, (g) Credit Acquiring including Asset Management for acquiring credit facilities from credit institutions (h) Crowdfunding Services Provision.
22. Operates in the following high-risk industries and is not registered in a Category F Country: (a) Licensed traders of precious metals/stones⁷, (b) Pawn shops, (c) Sporting / Hunting / Antique guns, (d) Internet Gaming other than electronic gambling, (e) Trading of art collection.

² Customers met in person by staff within the Group do not fall in the non-face-to-face category.

³ Provided that the group is well established with legitimate business.

⁴ Refer to FATF definition of a PEP and to OC151.

⁵ Exceptions apply for person servicing as diplomats/ambassadors in Cyprus.

⁶ In very exceptional cases, Financial or Brokerage Firms (or their subsidiaries) can be accepted and treated as high-risk customers, provided that FCSCD's consent is obtained. In such cases the opening / maintenance of client accounts is prohibited.

⁷ Conglomerate/well established companies (substantiated through independent sources) that are in the mining / exploration of gold and other precious metals industries from countries not included in Category F, can be accepted and treated as high-risk customers.

23. Is an Online Gambling or Online Casino company (including related services⁸ such as software providers, payment processing services, card acquirers) which is not regulated in a Category F Country.
24. Is a Payment Institution or an Electronic Money Institution (MSB) (including MSBs providing Money Transmission Services and Currency Exchange Services) which is not regulated in a Category F Country. Generally, MSBs regulated in Category F Countries can maintain only corporate accounts, to be utilized solely for the processing of administration expenses. Exceptionally, for a limited selective list of clients, a client account may be opened in any of the following cases:
- a. For MSBs whose activities are limited to the transmission of funds for physical persons serviced in Cyprus.
 - b. The AML Risk assessed is considered low based on the client's business profile and provided that no restrictions are imposed by our major correspondent banks.
25. Operates in the following Not Accepted Industries: (a) Online Pharmacies, (b) Trading in Binary options, (c) Dating, (d) Adult Entertainment, (e) Fortune Telling, (f) Medium activities, (g) Crypto Asset Service Providers and Virtual Asset Service Providers (CASPs and VASPs, including related services (custody services, trading platforms, exchange services, wallet services, order execution, payment processing, etc.)), (h) Military Missions, (i) Production and/or Wholesale Trading of Nuclear Related Raw Materials, Products and Services, and (j) Defense / Arms / Military Industry⁹.
26. Is a client with a Russian / Belarusian nexus with any of the following characteristics:
- i. Individuals included on the Putin List, as per the US Treasury Department's CAATSA 241 report, dated 29/1/2018 (including any legal entities they own / participate in share capital / control by more than 20%¹⁰).
 - ii. State-Owned Russian / Belarusian entities (including any legal entities they own / participate in share capital / control by more than 20%⁹)
 - iii. Legal entities registered in Russia / Belarus or with main Tax Residency in Russia / Belarus. The prohibition does not apply to legal entities they own / participate in share capital / control registered outside Russia / Belarus.
 - iv. Entities designated under Sectoral Sanctions by OFAC / EU / UK (including any legal entities they own / participate in share capital / control by more than 20%⁹).
 - v. Politically Exposed Persons (PEPs) from Russia and Belarus (including PEP related individuals and PEP related entities which participation in the share capital / are controlled / owned by the PEPs by more than 20%¹⁰).
 - vi. Entities whose main economic activity location after February 2022 is in Russia / Belarus / Kazakhstan / Turkey / Armenia / Kyrgyzstan in industries other than those listed on the Whitelist included as Appendix in GC 2022/003.
 - vii. Temporarily, it is forbidden to commence / maintain a business relationship with individuals:
 - a. Whose permanent residency is in Russia or Belarus, and they are not holders of a passport from an EU country, Iceland, Lichtenstein, Norway or Switzerland.

⁸ If the online gambling company and online casinos they are cooperating / associated with, is not regulated in a Country included under Category F.

⁹ Certain exceptions apply as per OC151

¹⁰ For participation in Legal entities between 5% and 20% FCSCD approval and Par.27 apply.

- b. With a passport from Russia / Belarus and who (1) do not reside in an EU country, Iceland, Lichtenstein, Norway or Switzerland or (2) are not holders of a passport from an EU country, Iceland, Lichtenstein, Norway or Switzerland.

Exceptions apply for people planning to move to Cyprus (except under a tourist visa).

- viii. Temporarily, it is forbidden to commence a business relationship with an entity whose UBO is an individual falling under the criteria described in point vii, above.
 - ix. Individuals (irrespective if they are in possession of dual nationality) or legal entities (irrespective of country of registration), where a direct or indirect connection is identified with the Russian government (either through structure, or through transactional activity, or common investments).
 - x. Individuals (irrespective if they are in possession of dual nationality) or legal entities (irrespective of country of registration) where a direct or indirect connection is identified with another individual or legal entity that falls outside the Whitelist with no intention and absence of action to immediately disengage, and this is identified through:
 - corporate structure (applies only for relationships between legal entities),
 - common investments,
 - any form of trading transactional activity.
 - xi. Individuals and Legal entities (irrespective of dual nationality or registration) with a Russian / Belarusian nexus with high or significant negative media in accordance with OC 151.
 - xii. Individuals and Legal entities (irrespective of dual nationality or registration) with influence on the Russian economy or Russian State.
27. Transactions relating to trading with Russia / Belarus / Kazakhstan / Turkey/ Armenia / Kyrgyzstan, if the product is not on the Whitelist, as per the parameters in relevant Appendix in GC 2022/003.
28. Is a fund, whose risk, based on the 'Scorecard of Investment Funds' (included in the Portal) is determined to be Not Accepted.
29. Is a legal entity with a complex structure, where there is no transparent and legitimate economic reason for its complexity.
30. Is a foreign government organization of a country not included in Category F and there is no reasonable ground/business justification for establishing such a business relationship.
31. Is a non-Profit Organisation or Charity or Foundation for charity purposes, which is either:
- not registered/established and operating in Cyprus or
 - registered/established and operating in Cyprus but is not reputable and well known.
- Exceptionally, a business relationship could be established with a limited selective list of the aforementioned entities registered/established and operating in a Category F Country, if they relate to very reputable global organizations, and there is a justifiable need for operating a BoC account in Cyprus. The above provisions also apply to clients who are ultimately owned by more than 50% by Non-Profit Organizations or Charities or Foundations set up for charity purposes.
32. Is introduced by a Professional Intermediary but has not been met in person before the opening of accounts.
33. Is a Respondent Bank which is not regulated in an EEA Country .
34. Is a client whose overall profile is deemed to entail higher risk of sanctions circumvention.

Ring Fencing Guidelines

Regarding the above prohibitions, in cases where the client is part of a group operating in, amongst other industries, an industry which is considered not accepted as per the above parameters, the client may in very exceptional cases be accepted if mitigating measures are taken to ensure, beyond reasonable doubt, that the transactions processed through the BoC are not connected to the non-accepted activities of the group, whilst ensuring that the non-accepted activities represent a minimal portion of the overall turnover, determined on an ongoing case by case basis. Such clients could be accepted as Critical Risk under very specific conditions, including consent from the AMLCO.

Examples of Not Accepted Types of Accounts

1. Nested Accounts,
2. Payable-through-accounts,
3. Fiduciary Deposits Accounts on behalf of Credit Institutions not regulated in a Category F Country,
4. Omnibus accounts (concentration accounts),
5. Accounts in USD for any Persons connected¹¹ with countries in Appendices 2&3 of the BoC's Sanctions Policy,
6. Accounts in USD, CAD or RUB for Online Gambling (including related services) Companies, Casinos, Online Casinos or Bookmakers and irrespective if the customer operates in or is regulated in a Category F Country.

Examples of Not Accepted Types of Transactions

1. The undertaking of transactions with customers resident¹² in countries included in Appendices 1,2 and 3 of the Sanctions Policy, that can create credit exposure¹³ to the BoC.
2. The processing of wire transfers in any currency from /to Banks established in countries included in Appendices 2&3 of the Sanctions Policy.
3. The processing of wire transfer in USD (or involving US Correspondent Banks), either (i) for Persons connected¹¹ with countries in Appendices 2&3 of the Sanctions Policy, or (ii) involving countries in Appendices 2&3 of the Sanctions Policy.
4. The processing of wire transfers in any currency relating to:
 - a. third party lending¹⁴ (in any form, including promissory notes) / assignment of loans and any other similar types of financing, between parties who do not belong to the same group of companies and where the main activities of the party lending the money are not related to the financial sector, with the exception referred to in Appendix 2.
 - b. consultancy services where there is no adequate information/appropriate documentation regarding the professional expertise of the consultant (such as educational qualifications/ relative working experience), the reasonableness/adequacy of the agreement between the parties, as well as the reasonableness of the fee.

¹¹"Persons Connected" covers (i) For Individuals: Country of Residence / ID / Passport, (ii) For Legal Entities: Country of incorporation, or country of Residence / ID / Passport of Directors, Signatories, Shareholders or Beneficial Owners, (iii) any natural or legal person, entity or body operating in a sanctioned country, (iv) the government/state of a sanctioned country or any public authority thereof.

¹²In the case of legal entities, the term "resident" refers to the country of registration or economic activity, or the country of residence of any of the directors, signatories, shareholders or beneficial owners.

¹³Please refer to Credit Risk Policies and procedures.

¹⁴Lending between family members is not considered as a third-party lending.

- c. funds sourced from virtual currency trading¹⁵ of individuals or legal entities unrelated to VASPs and CASPs.
 - d. counterparties subject to specific or sectoral EU, U.S., UK and U.N sanctions, including related entities with ownership (directly or indirectly) equal or over 50%.
 - e. Transfer of funds for transitory purposes (funds credited for a short period of time and then returned to the originator).
 - f. Export / Import of dual use goods to / from all countries listed Appendices 1,2&3 of the Group Sanctions Policy.
 - g. Export of dual use goods to countries deemed to entail high sanctions circumvention risk (as per the provisions of GE 2022/003).
5. The provision of Downstream Correspondent Clearing Services.
 6. Transactions related to trading of ivory and/or any protected species and related products.

¹⁵ This does not necessarily mean that the client relationship is terminated, however, such transactions cannot be processed by the BoC.

Appendix 2 - Examples of High-Risk customers (individuals and/or legal entities)

Important Notes:

1. The following categories of customers are designated as high risk subject to enhanced due diligence measures, as prescribed by:
 - a. The Law or the Directive of the Central Bank of Cyprus:
 - Politically Exposed Persons (“PEPs”)
 - Complex or unusually large transactions or unusual types of transactions
 - “Client accounts” in the name of third persons.
 - Foundations and Trust Accounts
 - Respondent relationships with banks not regulated in the EEA.
 - Clients residing in High-Risk Countries (on a reasonable validated risk basis)
 - Transactions sourced / generated from High-Risk countries (on a risk basis)
 - b. The Bank, in accordance with its risk appetite on ML and TF risk.
2. The categorization of a customer as High Risk is based on the overall score assigned by the automated scorecard, considering all risk parameters.
3. For Countries Categorization, please refer to Appendix 3.

Examples Geography Risk Factors, which, considered on their own, classify a customer as High Risk

1. Individuals whose ID / Passport Country is a Country included in Category A1¹⁶
2. Individuals whose Country of Residence is a Country included in Category B.
3. Legal entities whose Country of Registration or Country of Economic Activity is a Country included in Category B.
4. Legal entities where the Country of Residence of any of its Directors, Signatories, Shareholders (=>25%) or Beneficial Owners (=>25%) is a Country included in Category B.

Examples of Customer / Legal form Risk Factors, which, considered on their own, classify a customer as High Risk

1. Legal entities with complex corporate structures, provided there is a transparent and legitimate economic reason for their complexity.
2. Foreign government organizations and Embassies of countries other than the ones included under Category F, provided there is reasonable ground/business justification for establishing a business relationship.
3. Persons associated with negative media related to ML/TF (the negative media identified need to be classified as High Risk.)

Examples of Employment / Economic Activity Risk Factors, which, considered on their own, classify a customer as High Risk

1. Customers involved in the Production and/or Wholesale Trading of (i) Petroleum Products, such as oil and petrol, (ii) Energy such as natural gas, CO2 emissions or wind power.
2. Customers operating in the following high-risk industries, provided they are regulated/licensed in a Category F Country: (i) Online Gambling and Online Casinos¹⁷ (including related services such as software

¹⁶ If the individual is also resident in a Category A1 Country, then they are considered as Not Accepted

¹⁷ Additionally, Online Gambling and Online Casinos companies are not permitted to open client accounts.

- providers, payment processing services, card acquirers), (ii) Casinos (excluding online casino games), (iii) Betting Houses, (iv) Financial or Brokerage firms, (v) Insurance Services Companies, (vi) Payment Institutions and Electronic Money Institutions (including MSBs providing Money Transmission Services and Currency Exchange Service), (vii) Organizations providing Armed Security Services, (viii) Crowdfunding Services Provision, (ix) Sporting / Hunting / Antique guns.
3. Customers operating in the following high-risk industries, provided they are registered in a Category F Country: (a) Licensed traders of precious metals/stones¹⁸, (b) Pawn shops, (c) Trading of art collection.
 4. Funds, whose overall risk score, based on the 'Scorecard of Investment Funds' (included in the Portal) is determined as high risk.
 5. Foundations for business or private purposes, if they are not registered in a Category A, A1, A2 or B country.

Examples of Product Risk Factors, which, considered on their own, classify a customer as High Risk

1. Fiduciary Deposits from reputable credit institutions regulated within a Category F Country.

Examples of Behavior Risk Factors, which, considered on their own, classify a customer as High Risk

1. Customers for whom the Bank received three or more inquiries from Correspondent Banks.
2. Customers flagged by Compliance for Close Monitoring.

Types of Transaction treated as High Risk

1. Transfers relating to third party lending (in any form, including promissory notes) / assignment of loans, between parties who do not belong to the same group of companies and where the main activities of the party lending the money are not related to the financial sector. These transactions, apart from being treated as high risk, can be executed, provided enhanced due diligence is performed in all other respects and if all specific criteria¹⁹ are met.
2. Additionally, one-off transfers between individuals (interbank or to/from other Banks) relating to personal loans may be exceptionally accepted, under certain criteria¹⁹.
3. Receipt of funds from Crowdfunding Services.
4. Transactions related to cultural artefacts and other items of archaeological, historical, cultural and religious importance, or of rare scientific values.

¹⁸Conglomerate/well established companies (substantiated through independent sources) that are in the mining/ exploration of gold and other precious metals industries from counties not included in Category F can be accepted and treated as high-risk customers

¹⁹Refer to OC151

Appendix 3 – Country Risk Categorization

The Geography Risk Factors used by the scorecard to determine the risk level of prospect and current customers, derive from the Country Risk Categorization Methodology, which assesses the ML/TF risk emanating from each country and geographic area.

The ML/TF risk of each country is based on several indexes and standards available, as well as the opinion of the AMLCO. Examples of such indexes and standards include the Basel AML Index Report, the Corruption Perception Index, FATF/Moneyval Public Statements, EU List of High-Risk Countries, EU/OECD List of Non-Cooperative Jurisdiction for Tax Purposes, Sanctions imposed by OFAC/EU/UN.

The country risk categorization is utilized for the score card to assign scores for geographical risk factors. Individuals are scored based on their Country of Residence and their Country of ID / Passport. Legal entities are scored based on the Country of Registration, Country of Economic Activity, as well as the Country of Residence and ID/Passport Country of their Directors, Signatories, Shareholders (=>25%) and Beneficial Owners (=>25%). Scores are also assigned based on the country of origin / destination of wire transfers.

Countries fall within the following ML/TF categories:

1. Category A: Countries included in Appendix 3 of the Sanctions Policy and Dissolved Jurisdictions/Countries
2. Category A1: Countries included in Appendix 3 of the Sanctions Policy and Countries associated with severe negative media relating to ML/TF/Evasion of Sanctions
3. Category A2: Countries included in Appendix 2 of the Sanctions Policy, EU list of non-cooperative jurisdictions for tax purposes
4. Category B: Countries with High Risk profile/characteristics including, among others, countries with significant deficiencies as per FATF, and counties included in the EU/Moneyval list of high-risk countries.
5. Category C: Countries near war zones and/or near jurisdictions with connections with known terrorist organisations or associated with Significant Negative Media regarding ML/TF Deficiencies
6. Category D: Countries as per Compliance Division's Country Methodology, which takes into consideration various Indexes (e.g. Basel, CPI, FSI)
7. Category E: Moderate Risk Countries
8. Category F: Countries which entail the lowest ML/TF risks, including, among others, EEA countries.