

COMBATING MONEY LAUNDERING AND FINANCING OF TERRORISM

NBG, through its strong presence in the country as well as with its dynamic profile in Southeastern Europe and the Eastern Mediterranean, heads the largest Group of financial services in Greece. Given its eminent position in the banking sector and aiming at the implementation of the "leading by example" principle, NBG grants primary importance to the neuralgic sector of prevention and combating of money-laundering and financing of terrorism (AML/CFT).

In this context and in compliance with Law 3691/2008 and the Bank of Greece relevant regulations, the NBG Group took all necessary measures in relation to AML/CFT issues, especially as to the following:

- Adoption of the following Policies:

- a. NBG Group Anti-Money Laundering and Combating Financing of Terrorism Group Policy,**

- b. NBG Group Customer Acceptance Policy,**

which determine the framework, the basic principles and rules for the Bank's and the Group Companies' protection from their potential use by third parties for AML/CFT purposes

- c. NBG Group AML/CFT Policy for Cross-Border Correspondent Banking,** which endorses a specific approach in managing correspondent banking relationships

- Development of appropriate procedures and internal Circulars for the implementation of the above Policies
- Installation of appropriate IT systems
- Observance of the basic "Know your Customer" principle and creation of clients' financial/transaction profiles
- Conduct of special/preventive inspections in order to identify potential deficiencies/weaknesses

- Personnel training
- Regular evaluation of the Bank's structures and procedures for the prevention of money-laundering and financing of terrorism, in order to improve their efficiency

❖ **Have you introduced yourselves? If not...do it now**

In order to inform existing or new clients about the obligations deriving from the legislation in force regarding submission on their part of data and information adequately certifying their identity and income, the Bank makes available to its customers the Hellenic Bank Association leaflet "*Have you introduced yourselves? If not...do it now*"

❖ **U.S. Patriot Act Certification**

Given the fact that NBG holds correspondent accounts in credit institutions based in the United States of America, it has completed the U.S. Patriot Act Certification.

The Certification may be used by credit institutions or financial organizations which either already have or wish to conclude correspondent banking relations with the Bank or its Branches located abroad.