



Bank Polski

## PROTECTION AGAINST MONEY LAUNDERING

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1. The Bank implements the obligation of the Act No. 297/2008 Coll., on Prevention of Legalization of Proceeds of Criminal Activity and Terrorist Financing and Act No. 492/2009 Coll., on Payment Services and Act No. 289/2016 Coll., on Execution of International Sanctions and performs the following activities:

- a) identification of Customer and verification of the Customer's data
- b) identifying the Ultimate Beneficial Owner (UBO) and taking adequate measures to verify UBO's identification
- c) obtaining information on the purpose and intended nature of the transaction or business relationship,
- d) verification whether the Customer or the Customer's UBO is a politically exposed person or sanctioned person,
- e) depending on the risk of money laundering or terrorist financing, the determination of the origin of funds or property used in the transaction or business relationship,
- f) verification whether the Customer acts in their own name,
- g) conducting ongoing monitoring of the business relationship including the review of particular transactions carried out throughout the duration of the business relationship in order to find out whether the transactions are consistent with knowledge of the Customer, his business profile and summary of possible risks connected to the Customer,
- h) updating of the documents, data or information on the Customer available to the Branch.

2. The Bank is obliged to keep the following records:

- a) Customer's data and written documents - for the period of 5 years following the termination of the business relationship with the Customer,
- b) all data and written documents concerning a transaction - for the period of 5 years from the moment of the carrying out a transaction.

3. The Bank reserves the right to restrict the Customer or the attorney's ability to control the account or any person's authorisation to control the funds in the account by not executing the transaction and freezing or blocking funds in the account in the cases provided for in the Act No. 297/2008 Coll., on the Prevention of Legalization of Proceeds of Criminal Activity and Terrorist Financing, as amended, and the regulations concerning the seizure of funds in bank accounts as part of enforcement proceedings.

Furthermore, in order to fulfil the obligations under these regulations, the Bank may require the Customer to provide additional oral or written explanations or present documents necessary for the transaction to be executed. The Bank reserves the right to refuse to execute a transaction to countries, entities or individuals subject to national or international sanctions or embargoes, in particular the sanctions implemented by the European Union, the United States of America or the United Nations in connection with the execution of duties, based on anti-money laundering and terrorist financing regulations or sanction policy. In such case, the Bank will make every effort to notify the Customer of such refusal without delay.

4. The Bank as a payment service provider of the payer shall ensure that transfers of funds are accompanied by the following information on the payer:

- 1) the name of the payer;
- 2) the payer's payment account number; and
- 3) the payer's address, official personal document number, customer identification number or date and place of birth.

5. The Bank as a payment service provider of the payer shall ensure that transfers of funds are accompanied by the following information on the payee:

- 1) the name of the payee; and
- 2) the payee's payment account number.

6. In the case of a transfer not made from or to a payment account, the Bank of the payer shall ensure that the transfer of funds is accompanied by a unique transaction identifier rather than the payment account number(s).

7. Before transferring funds, the Bank of the payer shall verify the accuracy of the information referred to in point 4 on the basis of documents, data or information obtained from a reliable and independent source

8. In case of a transfer of funds, the Bank provides information on the payer and payee and makes sure this information is complete."