

INFORMATION REGARDING THE ČSOB EMBARGO POLICY



About us – ČSOB Financial Group

ČSOB Financial Group (hereafter ČSOB FS) is one of the largest bancassurance groups in Slovakia and for its clients provide a wide portfolio of products and services, primarily account management, asset financing through loans and leasing, various types of insurance, products for financial security in old age or disability, housing financing in the form of mortgage loans or building savings, collective investment, and asset management, as well as services related to trading in shares on financial markets. ČSOB FS is part of an international bancassurance group KBC Group NV.

KBC Group is an integrated bancassurance group focusing on individuals, small and medium-sized enterprises, and corporations, as well as private banking. The group operates primarily in Belgium, but also in the Czech Republic, Slovakia, Bulgaria and Hungary, Ireland and, to a limited extent, in several other countries around the world.

ČSOB Financial Group means:

- **Československá obchodná banka, a.s.**
registered office: Žižkova 7802/11, Bratislava 811 02, IČO: 36 854 140,
- **ČSOB Poistovňa, a.s.**
registered office: Žižkova 7802/11, Bratislava 811 02, IČO: 31 325 416,
- **ČSOB Leasing, a.s.**
registered office: Panónska cesta 11, Bratislava 852 01, IČO: 35 704 713,
- **KBC Asset Management NV, pobočka zahraničnej správcovskej spoločnosti**
registered office: Žižkova 7802/11, Bratislava 811 02, IČO: 47 243 929,
- **ČSOB nadácia**
registered office: Žižkova 7802/11, Bratislava 811 02, IČO: 42 182 743

Due to the dynamic development of the situation, especially in connection with the Russian-Ukrainian conflict, the legal framework, and therefore the embargo policy of the ČSOB FS, may change at any time. The information in this document will be updated as necessary.

Embargoes

International organizations and authorities such as the United Nations, the European Union, OFAC and local or other national authorities can all impose restrictive measures against countries, organizations, legal entities and / or individuals for committing or being suspected of infringement of human rights and international law, acts of crime, terrorism, money-laundering etc. These measures are most referred to as sanctions or embargoes.

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An embargo is a restrictive measure or sanction on national and/or international level. Although provisions differ by country, person or agency, there are two common types of embargoes:

- **Financial embargoes:** restrictions related to financial operations and financial resources,
- **Trade embargoes:** restrictions on the import or export of certain goods or trade with certain countries or parties

ČSOB FS has a responsibility to its clients and international authorities/organizations to conduct business in a legal and ethical manner. For this reason, it complies with binding legal regulations and regulations and may, for reasons of social responsibility, opt for stricter rules than those set by law. ČSOB FS complies with financial and trade embargoes issued by the United Nations (made enforceable in Slovakia), the European Union and by the Slovak legislator, and any other embargo issued by a number of Third Countries that it determines are relevant such as the USA (OFAC), UK (OFSI).

Observing embargo regulations means that ČSOB FS will not provide funds or economic resources to persons, entities or government agencies that appear on embargo sanction lists or support any kind of transaction with these parties. Any other payments or transactions with persons or entities that are on sanctions lists or breach of sanctions regulations or ČSOB FS policy are strictly prohibited and will not be processed.

Sometimes companies or entities are not explicitly sanctioned, but they may be owned or controlled by individuals or entities subject to an asset freeze, making it prohibited to continue to do business with them. In this context, ČSOB FS asks its customers to perform their own due diligence in order to make sure they are not dealing with sanctioned parties.

ČSOB FS does not trade with sanctioned parties.

ČSOB FS has implemented certain screening measures in its different processes to ensure compliance with the applicable restrictions and regulations and with its own policy where this is stricter. As a result, a customer may be requested to provide ČSOB FS with more information or documentation on transactions or counterparties before ČSOB FS can process a transaction or payment.

For ČSOB FS it is unacceptable to process payments that aim to circumvent applicable sanctions regimes and internal policy rules, by intentionally or unintentionally making payments through intermediary financial institutions and entities in other countries (so-called indirect payments).

Please note that **Correspondent Banks also have the right to suspend any transaction** in case their monitoring system detects a potential breach of embargoes. In case of suspended transactions ČSOB FS acts only as intermediary between the customer and the correspondent bank, without having any influence on the result of their investigation.

To avoid complications customers are advised to contact the bank when considering doing business with countries, persons, entities or government agencies against which restrictive measures have been imposed.

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The bank, in accordance with General Business Terms and Conditions, has the right not to execute payment orders in favor of recipients and banks if the country of the recipient/payer of the payment, the country of the recipient/payer's bank and its branches and the recipient/payer of the payment are subject to restrictive measures in accordance with the current list of sanctioned entities, an embargo is declared or there is a suspicion that the payment order will be blocked by authorized persons abroadx.

ČSOB FS specific country policies

ČSOB FS applies a stricter policy with respect to the following countries: Afghanistan, Belarus, Cuba, Iran, Myanmar, North – Korea, Russia, Russian occupied regions of Ukraine, Sudan, South Sudan, Crimea, Syria and Venezuela.

ČSOB FS considers these countries to be more sensitive, for instance because of complex embargoes or export control regulations imposed under UN, EU or Third Country legislation and/or because of the presence of a significant number of blocked individuals or entities.

Through a thorough screening of the transaction details ČSOB FS wants to make sure that the transaction is legally allowed and within the limits of our own policy.

The details for each country policy may change at any time, due to changing regulations or political circumstances..

Afghanistan

Following the Taliban takeover of the country and the Afghan state apparatus, ČSOB FS will no longer process any payment or transaction related to Afghanistan.

Belarus

Due to the situation associated with sanction mechanisms towards Belarus, the ČSOB FS is adjusting its embargo policy. The sanctions regarding Belarus are very diverse and comprehensive, related to different range of activities, businesses and trades, persons, and entities.

With effect from 24 May 2025, ČSOB FS will not process payments or transactions related to Belarus meaning the bank of the sender and the recipient is located in Belarus or the residential address of the sender or the recipient is in Belarus. ČSOB bank will only process payments or transactions from or to Belarus for existing customers linked to the food, medicines (and medical supplies- excluding machines) and education sectors, that also meet other strict conditions.

USD/GBP/CAD payments or transactions from or to Belarus will not be processed.

Transactions routed through other countries that aim to circumvent applicable sanctions restrictions or internal embargo policies are not permitted and will be rejected and reported to the local competent authorities. Clients who are permanent residents, established in Belarus or have Belarusian nationality may be subject to additional restrictions.

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ČSOB FS will not process any transaction, including incoming payments, involving a sanctioned counterparty or otherwise in breach of embargoes.

Be advise that several banks have been disconnected from the SWIFT network from 20.03.2022 inwards and ČSOB FS is not able to process transactions to or from these banks. Please refer to SWIFT for more information. In this context, ČSOB FS would like to point out that several (Belarussian) banks are subject to an asset freeze imposed by the EU, US, or UK.

Given the volatility of the situation and the vulnerability of Belarus financial market, the Belarusian currency and the liquidity of this currency, ČSOB FS would like to point out to its clients the risks associated with all transactions involving Belarus or Belarusian currency, as well as the fact that the bank cannot guarantee that our clients' transactions will be completely and processed without problems. Clients may be asked to provide additional information and documents related to the payment.

Please note that although some companies or entities have not been explicitly sanctioned, they may be owned or controlled by individuals or entities subject to sanctions or asset freeze. It is forbidden to continue any business activities with these entities. In this context, ČSOB FS asks clients to pay attention to their own business and to make sure that they do not deal with the counterparty that is subject to sanctions, even indirectly.

ČSOB FS does not trade with sanctioned parties.

Cuba

ČSOB FS will not process any payments in USD, CAD or GBP that involve Cuban parties. ČSOB FS will only process payments in other than above mentioned currencies for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of our own policy. In addition, customers that are resident in, established in (or moving to) Cuba can be subject to additional restrictions.

Iran

ČSOB FS maintains a strict policy with respect to Iran. ČSOB FS with respect to Iran will only process trade related payments and transactions only for its own customers who are active as producers of medicines and / or medical supplies, excluding medical machinery (equipment), as far as the following cumulative conditions are met:

- The customer is a longstanding ČSOB FS customer with a diversified product portfolio; and
- It does not concern (direct, nor indirect) payments or transactions in USD, in CAD or in GBP; and
- The transactions are documented in detail; and
- After thorough screening of the transaction details, including all involved parties, it is clear that the transactions are transparent, legally allowed and within the limits of internal policy with regard to Iran.

In addition, customers that are resident in, established in (or moving to) Iran can be subject to additional restrictions.

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Myanmar / Burma

Besides financial transactions to and from sanctioned persons and entities, certain transactions and related financial transactions are excluded, regardless of the currency, including, but not limited to, transactions related to the export of arms and related military goods, dual-use items, and goods and equipment, technology and software included in the trade embargo list and mainly used for monitoring and interception of incoming and outgoing internet and phone communications.

Therefore, a financial transaction regarding Myanmar/Burma will only be processed after thorough screening of the transaction details, to make sure that the transaction is transparent, legally allowed and within the boundaries of internal policies.

North-Korea

ČSOB FS will not process any payment or transaction that is related to North-Korea.

Russia and Russian-occupied regions of Ukraine

Due to the volatility of the situation and the vulnerability of the local financial market, the local currency, and the liquidity of this currency, ČSOB FS would like to remind its clients of the risks associated with all transactions involving Russia. ČSOB FS cannot provide any guarantees regarding the successful processing of such payments. ČSOB FS provides limited services in connection with transactions from/to Russia and does not execute transactions in the Russian Ruble (RUB).

ČSOB FS will under no circumstances be liable for the failed execution or non- execution of these transactions as a result of its embargo policy, government measures, market conditions or the failure of our correspondent banks to execute the transactions or execute them correctly or timely.

With effect from 24 May 2025, ČSOB FS will not process payments or transactions related to Russia meaning the bank of the sender or the recipient is located in Russia or the residential address of the sender or the recipient is in Russia.

ČSOB bank will only process payments or transactions from or to Russia for existing customers linked to the food, medicines (and medical supplies- excluding machines) and education sectors, that also meet other strict conditions. Such payments may be processed after thorough verification of the transaction details and determination of its compliance with applicable sanctions measures and ČSOB FS Embargo policy.

USD/GBP/CAD payments or transactions from or to Belarus will not be processed.

Transactions routed through other countries that aim to circumvent applicable sanctions restrictions or internal embargo policies are not permitted and will be rejected and reported to the local competent authorities.

Clients who are permanent residents, established in Russia or have Russian nationality may be subject to additional restrictions.

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At the same time, ČSOB FS would like to point out that, due to the constantly changing situation, which also affects the payment system, the processing time for incoming payments may be noticeably longer due to their detailed investigation. Clients may be asked to cooperate (additional information and documentation) in verifying payments and their compliance with applicable sanction measures and principles.

ČSOB FS will not maintain any accounts and/or other products in the RUB (Russian Ruble). Until further notice ČSOB FS will not process any incoming and outgoing payments in RUB.

In addition to the above restrictions, ČSOB FS will not process any transaction, including incoming payments, involving a sanctioned counterparty or otherwise in breach of embargoes. In this context, ČSOB FS would like to point out that several (Russian) banks are subject to an asset freeze imposed by the EU, US or UK.

Sometimes companies or entities are not explicitly sanctioned, but they may be owned or controlled by individuals or entities subject to an asset freeze, making it prohibited to continue to do business with them. In this context, ČSOB FS asks its customers to perform their own due diligence in order to make sure they are not dealing with sanctioned parties directly or indirectly.

Be advised that several banks have been disconnected from the SWIFT network and ČSOB FS is not able to process transactions to or from these banks. Please refer to [SWIFT](#) for more information.

Trade restrictions with respect to Russia

Russia is subject to a wide range of import and export restrictions, applicable to every importer or exporter.

Transactions via other countries that aim to bypass these trade restrictions and/or ČSOB FS own embargo policy are prohibited and will be rejected and/or reported to the competent authorities.

ČSOB FS applies an enhanced due diligence for transactions involving Russia. The necessary documentation (invoices, bill of lading, etc.) will be requested, and as a result, it is possible that the processing of related payments is (significantly) delayed.

Finally, customers that have Russian nationality or are resident in Russia can be subject to additional restrictions.

Russian-occupied regions of Ukraine and impact on Ukraine as a country

All transactions to or from the regions of Crimea, Donetsk, Luhansk, Zaporizhzhia and Kherson are prohibited and will not be processed. Apart from these regions, ČSOB FS will continue to process transactions (both open account payments and trade finance transactions) to and from Ukraine for its own Group customers. Any transaction with a sanctioned individual or entity, or otherwise in breach of embargoes or internal policies, is prohibited and will not be processed.

In addition, customers that are resident in, established in (or moving to) Crimea (and Sevastopol), Donetsk or Luhansk can be subject to additional restrictions.

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Syria

ČSOB FS will not process any payments in USD, CAD or GBP that involve Syrian parties.

ČSOB FS will only process payments in other than above mentioned currencies for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of our own policy.

In addition, customers that are resident in, established in (or moving to) Syria can be subject to additional restrictions.

Venezuela

Sanctions on Venezuela are very diverse and comprehensive and cover a range of various types of activities, persons, entities, and currencies.

ČSOB FS will not process payments in USD, GBP nor CAD, involving Venezuelan parties.

ČSOB FS will only process payments in other than above mentioned currencies for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of our own policy.

Sudan and South-Sudan

Many sanctions with regards to Sudan and South-Sudan have been revoked, however apart from the so-called name sanctions and asset freezes.

Irrespective of the currency, ČSOB FS will only process transactions (both trade related and retail transactions) for its own customers and after thorough screening of the transaction details, to make sure, the transaction is transparent, legally allowed and within the limits of internal policies.

Rules on dual use goods export controls

ČSOB FS will not process any transaction or financial transaction related to the export of dual-use items without the authorization of the competent authority. To be able to verify whether a transaction complies with all dual-use export control rules, the necessary documentation (invoices, authorization or license, etc.) will be requested, and as a result, it is possible that the processing of related payments is significantly delayed.

What are dual-use items?

Dual-use goods are products, goods, and technology that can be used in both civilian and military sectors. These types of goods and technologies, in the wrong hands, could be used to suppress human rights or launch terrorist attacks. The export of these goods is subject to restrictions by the EU, US, UK, and other countries.

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EU general restrictions with respect to dual-use

The EU imposes restrictions with respect to the export, transit, brokering and technical assistance of dual-use items, so that it can contribute to international peace and security and prevent the proliferation of Weapons of Mass Destruction

The EU Regulation 2021/821 ('the EU Dual-Use Regulation') governs the EU's export control regime and includes a common EU list of dual-use items (in Annex I to the Regulation) and the rules for obtaining authorizations/licenses. In Slovakia, the implementation of this regulation is ensured through the dual-use items law.

Dual-use items may be traded freely within the EU, except for some particularly sensitive items, whose transfer within the EU remains subject to prior authorization.

EU sanctions against **Russia and Belarus** impose further export restrictions concerning dual-use goods and technologies. The export of these items has been prohibited (i.e., no license or authorization is possible) even when these items are intended for civilian end-users or uses.

EU sanctions against **Myanmar** prohibit the export of dual-use goods and technology if those items are or may be intended for military use or military end-users.

As regards exports to **Syria**, it should be noted that EU Member States can prohibit the export of dual-use items or impose an authorization requirement.

For more information on UN, EU and OFAC sanctions, please visit the relevant links below:

UN (OSN): <https://www.un.org/securitycouncil/sanctions/information>

EU: https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en

US (OFAC): <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-informatio>

UK (OFSI): <https://www.gov.uk/government/organisations/office-of-financial-sanctions-implementation>