

CERTIFICATE

Of

BAWAG P.S.K. Wide Compliance and Money Laundering Rules and Regulations

This is to notify you that **BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse AG** (BAWAG P.S.K. Group) and all its branches and subsidiaries fully comply with the Austrian Banking Act and with the provisions set out in Council Directives number 308 of 10th June 1991 on Prevention of the Use of the Financial System for the Purpose of Money Laundering (91/308/EEC last revision 01/97/EEC). Such provisions have been included in the **Austrian Banking Act of 1994**, as amended.

BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse AG

- Physical presence: Georg Cochplatz 2, A-1018 Vienna, Austria
- Licence Nr: GZ: 23 5105/90-FMA-I/2/03
- Registration Nr: 205340x
- Supervisory Authority: Financial Market Authority (Finanzmarktaufsicht), A-1020 Vienna, Praterstrasse 23

The following procedures are to be understood as the **minimum** requirements for the **BAWAG P.S.K. Group**:

Written Policies

- BAWAG P.S.K. established written policies to prevent money laundering and terror financing.
- customer identification and verification of the true identity of customers before establishing a business relationship
- customer identification in line with FATF standards and Austrian laws
- money laundering and terror financing are crimes in Austrian legislation

Customer Due Diligence – ID-Check

- before opening an account
- for transactions amounting to or above €15.000,-
- for suspicious transactions
- purpose of opening an account
- establishment of ultimate economic beneficiary; this also applies for lawyers, notaries, certified public accountants, tax advisors and trustees
- no opening of accounts for a foreign bank that has no physical presence in any country (e.g. shell bank)
- no opening of anonymous accounts

Customer Documentation

- record keeping for 7 years
- updating of customer data

Suspicious Transaction Reports

- based on Compliance /ML risk indicators (e.g. suspicious routing of money transfer, suspicious cash transactions)
- to Austrian Financial Intelligence Unit (BKA)

Staff Training

- new employees have to attend AML training within the first 3 months of joining **BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse AG**
- annual general review
- special trainings after 2-3 years
- training must at least communicate knowledge about
 - money laundering itself
 - the importance of knowing the customers businesses and behaviours
 - methods and techniques of money laundering
 - how to detect possible money laundering
 - setting first proper actions in case of suspicion
- the participation must be documented for every single employee (name, date of attendance, contents)
- regular verification of quality and efficiency of our policies

For all compliance related issues **BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse AG** designated a senior official for AML Prevention.

This Certificate is also valid for all of our bank subsidiaries, i.e. easybank, Österreichische Verkehrskreditbank, BAWAG Wohnbaubank, BAWAG Banka d.d. Ljubljana, BAWAG-Malta-Bank LTD Sliema.

For further information, please see our homepage www.bawagpsk.com or please do not hesitate to contact us at compliance@bawagpsk.com.

Vienna, Februar 2009