

**CERTIFICATE  
Of  
KBC Bank Bulgaria EAD Wide Compliance, Anti-Money Laundering, Financial  
Sanctions and Counter-Fraud and Counter-Corruption Rules and Regulations**

This is to notify you that **KBC Bank Bulgaria EAD** and all its branches and subsidiaries fully comply with the Bulgarian Law for the Measures against Money Laundering and with the provisions set out in Council Directives on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (2015/849/EU).

Such provisions have been included in Bulgaria:

1. Measures Against Money Laundering Act (regulate preventive measures against using the financial system for money laundering purposes, as well as organizations and control over such measures);
2. Measures against the Financing of Terrorism Act (defines the measures against financing of terrorism, as well as procedure and control with respect to the application of the said measures).

Further, **KBC Bank Bulgaria EAD** has developed and implemented anti money laundering programs and principles that are designed to aim for compliance with the applicable anti-bribery and anti-corruption laws and regulations.

**KBC Bank Bulgaria EAD**

- License No: B12 issued by the Bulgarian National Bank, last change with order RD 22-2254/16.11.2009
- Registration No: 831558413
- Supervisory Authorities: Bulgarian National Bank, Bulgarian Financial Supervision Commission and Bulgarian Financial intelligence Agency

The following procedures, which have been approved by senior management and are appropriately exercised in compliance with local legal requirements, are to be understood as the minimum requirements for the **KBC Bank Bulgaria EAD**, include but are not limited to:

**General Note**

- Board of Management approved AML/Compliance Officer
- Senior Management approved written policies

**Customer Due Diligence**

- Identifying the customers and verifying the identity thereof on the basis of documents, data or information obtained from reliable and independent sources;
- Identifying the beneficial owner and taking reasonable measures to verify the identity
- Clarifying the ownership structure and control of the client;
- Collecting information and assessment of the purpose and nature of the business relationship
- Clarifying the source of funds in the cases provided for in law;
- Ongoing monitoring of the established business relationship and verifying the transactions and operations carried out throughout the course of the mentioned relationship, as to whether these transactions and operations are consistent with the risk profile of the customer and with the information collected

In cases where the bank cannot meet the requirements for a CDD, it is obliged to refuse to perform the operation/transaction or to establish a business relationship. In the cases of already established business relationships, in which the bank cannot fulfill the requirements

- disciplinary measures in case of breaches
- close and regular information exchange between AML and Counter-Fraud functions
- whistleblowing hotline and other disclosure methodologies in place

## Training

- new employees have to attend AML training within the first 3 months of joining **KBC Bank Bulgaria EAD**
- annual training for employees with direct or indirect customer contact (i.e. Relationship Manager or Sales Department)
- trainings are provided in the form of e-learnings and/or classroom trainings depending on necessity and requirements of the employees
- ad hoc trainings
- advanced training sessions
- training communicates at least knowledge about
  - o money laundering and sanctions
  - o the importance of knowing the customers businesses and behavior
  - o methods and techniques of money laundering, fraud, bribery and corruption o how to detect possible money laundering and fraud
  - o setting first proper actions in case of suspicion
  - o general employee compliance duties
- the participation is documented for every single employee (name, date of attendance, contents)
- regular verification of quality and efficiency of our policies

For all Compliance related issues, such as AML, Financial Sanctions and Counter-Fraud and Counter-Corruption activities, **KBC Bank Bulgaria EAD** has designated a Compliance Officer.

This Certificate is also valid for all branches and subsidiaries of **KBC Bank Bulgaria EAD**.

For further information, please see our homepage [www.kbcbank.bg](http://www.kbcbank.bg) or please do not hesitate to contact us at [Compliance@kbcbank.bg](mailto:Compliance@kbcbank.bg).

Sofia, July 2022

Radomir DUKOV  
Head of Compliance Department

