



## **General compliance statement relating to anti-money laundering (AML) and counter-terrorist financing (CTF)**

Luminor Bank AS, registration No. 11315936, legal address: Liivalaia 45, 10145, Tallinn, Estonia (hereinafter – Bank) complies with national and International AML and CTF legislation and Know Your Customer (KYC) policies.

Measures to combat Money laundering and the financing of terrorism are indicated in the Money Laundering and Terrorist Financing Prevention Act (hereinafter AML/CTF Act), which accordingly implements European Union (hereinafter – EU) AML/CTF directives.

Estonia is a member of the EU and Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL).

Like all Estonian financial institutions, the Bank is supervised by the Financial Supervision Authority of Estonia. The Financial Intelligence Unit of Estonia (hereinafter – FIU Estonia) is an independent structural unit of the Estonian Police and Border Guard Board, and the purpose of FIU Estonia is within its competence to prevent the finance system of the Republic of Estonia to be used for laundering of proceeds or derived from criminal activity and for terrorism financing.

The Bank has implemented financial crime and compliance solutions enabling us to combat money laundering and terrorist financing efficiently as well as meet the demands of regulators.

The Bank conducts a risk-based approach to customer due diligence and ongoing due diligence. Customer identification is based on personal appearance and approved identification documents or digital identification.

All employees are trained to detect and recognize suspicious transactions and transaction patterns. Suspicious transactions are investigated and reported to the local FIU.

Customer and transaction data are filed in accordance with legal requirements and can be retrieved.

Internal AML policies and procedures are reviewed by Audit.

All Estonian entities covered by AML/CTF Act, included Luminor Bank, need to have satisfactory internal control and communication procedures to ensure that the obligations pursuant to the AML/CTF Act are fulfilled.

The Bank is continuously looking to improve Bank's policies, guidelines, procedures and related technological solutions in order to efficiently combat money laundering and terrorist financing.

Tallinn 18.01.2018