

**Dear Customer,**

Raiffeisen Bank is committed to providing its Private Banking services at the highest possible standard. At the same time, we place great importance on legal compliance and adherence to the guidelines of the Hungarian National Bank. As part of these obligations, we would like to inform you about the most important aspects of customer identification and due diligence.

**Why is customer due diligence important?**

According to Act LIII of 2017 (Anti-Money Laundering Act) and the related recommendations of the Hungarian National Bank, the Bank is required to:

- **Record and verify customer identification data:**  
When establishing a business relationship, and periodically during its existence, we must update your personal and financial information.
- **Perform ongoing customer due diligence:**  
During the relationship, we monitor transactions and customer behavior to ensure the legality and security of financial operations.

These measures aim to prevent money laundering and the financing of terrorism, and to promote responsible and transparent banking operations.

**What does data reconciliation involve?**

Considering the specific nature of Private Banking relationships, during the data reconciliation process we will:

- Update your personal identification data
- Review information related to your business and financial activity, including the source and intended use of assets held with the Bank
- Request a declaration regarding your Politically Exposed Person (PEP) status, if applicable

**How should data changes be reported?**

In accordance with sections 12.1 and 12.2 of Chapter XII of Raiffeisen Bank's General Business Conditions, please notify your Private Banking advisor of any changes to your data without delay, but no later than within 5 business days.

**Proof of data changes:**

- **For individuals:** by presenting a valid personal identification document
- **For businesses:** with a company extract no older than 30 days, and in the case of foreign entities, with a certified Hungarian translation

## Disclosure of business ownership structure

If your business uses Private Banking services, a complete disclosure of the ownership structure is mandatory. Required documents include:

- A full ownership chain showing each level and ownership share
- Data of intermediate and ultimate beneficial owners
- Identification documents of the person(s) representing the business
- A signed ownership structure chart visually displaying ownership relationships

Exceptions include sole proprietors, primary producers, sole traders, and companies with exclusively private individuals as owners.

## Obligations regarding trust arrangements

If you are involved in a trust arrangement (such as a settlor, trustee, or beneficiary), you are subject to enhanced due diligence under the AML Act. The Bank may request the following documents:

- The trust agreement or an extract including:
  - Details of the parties (settlor, trustee, beneficiary)
  - Type and value of the managed assets
  - Purpose and duration of the arrangement
  - Rights of disposition
- Identification documents of the involved individuals and PEP declarations
- Declaration on the origin of the managed assets
- Data of the ultimate beneficial owner(s), if the structure is complex
- Ownership structure chart – in case of structured asset management

**Legal background:** According to Section 8 (1) g) of the AML Act, due diligence must cover all parties involved in a trust relationship. If this information is not available, the Bank is required to refuse the transaction or terminate the relationship, as stipulated in Section 13 of the AML Act.

## What happens if due diligence is not completed?

In accordance with the AML Act (Act LIII of 2017), Raiffeisen Bank can only provide financial services if full customer identification and due diligence have been completed.

If the required data, documents, or declarations are not provided, or their evaluation does not allow proper customer identification, the Bank is entitled or obligated to take the following actions:

- **For new clients:** refusal to open an account
- **For existing clients:** restriction of access to services or termination of the client relationship

These measures aim to ensure legal compliance and protect the integrity of the financial system. The Bank always strives to fulfill its due diligence obligations in a cooperative and client-friendly manner.

### **How is due diligence conducted?**

Personal due diligence is carried out **in a bank branch by appointment**, in the presence of a Private Banking advisor.

### **More information**

According to the regulations on the prevention of money laundering and terrorist financing, the Bank is obligated to perform due diligence, update client data regularly, and keep them up to date under all circumstances.

If you have any questions, please do not hesitate to contact your Private Banking advisor.

Sincerely,  
Raiffeisen Bank Zrt.