

Statement on Compliance with Anti-Money Laundering Requirements

As part of its business approach as a transparent and socially responsible banking group, ProCredit is firmly committed to participating in international efforts to combat money laundering, the funding of terrorism and other acts punishable by law.

ProCredit Holding, the parent company of the ProCredit group, is located in Frankfurt am Main, Germany. The ProCredit group is supervised by the German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, BaFin).

The Federal Republic of Germany has enacted laws and rules designed to implement the anti-money laundering directives of the European Union (EU) and the standards set by the Financial Action Task Force (FATF). BaFin is also a member of the Basel Committee on Banking Supervision (BCBS) and adheres to its supervisory standards, guidelines and recommended best practices.

All ProCredit institutions are subject to the highest AML standards. The group shares an anti-money laundering (AML) programme designed and supervised by ProCredit Holding in compliance with German rules and international standards regarding the prevention of money laundering, financing of terrorism and other acts punishable by law. In addition, all ProCredit institutions comply with the local laws and regulations in their respective countries of operation.

The ProCredit group framework for the prevention of money laundering, financing of terrorism and other acts punishable by law ensures the following:

- **Appointment of an Anti-Money Laundering Officer**

Every ProCredit bank appoints an AML Officer who is responsible for regularly reporting to the Management Board of the respective bank as well as to the Group AML Officer at ProCredit Holding.

- **Consistent customer due diligence procedures**

Every ProCredit bank applies a strict Know Your Customer and Know Your Correspondent (KYC) approach in its customer due diligence and correspondent banking procedures.

- **Training and awareness**

AML staff trainings are conducted on an ongoing basis for all ProCredit staff members when they enter the group and at regular intervals thereafter within the framework of the respective ProCredit bank's training plan. The AML training measures are complemented by an e-learning program to maintain a high level of awareness with regard to the warning signs of money laundering, terrorist financing and criminal activities among all members of staff.

- **Risk classification of customers**

Every ProCredit bank maintains a risk classification of its customers, in order to assess the risks of money laundering, terrorist financing and criminal activities, and applies due diligence and monitoring procedures accordingly.

- **Customer data, transaction and account monitoring**

In order to detect potentially suspicious activities, all ProCredit banks use an IT-based monitoring system, implemented group-wide, and apply consistent standards for data and transaction monitoring. All ProCredit banks adhere to national and international sanctions and embargoes.

– **Suspicious activity reporting**

AML Officers at every ProCredit bank report suspicious activities to their local Financial Intelligence Units (FIU) and other authorities according to local regulations as well as to the Group AML Officer.

ProCredit banks do not hold anonymous, nested, or shell bank accounts and respect all applicable rules related to asset freezing and document filing and archiving.

Furthermore, the structural and procedural organisation to prevent money laundering, financing of terrorism and other acts punishable by law is audited annually at all ProCredit banks as well as on a group level at ProCredit Holding.

Important information for new customers

In the interest of fighting the funding of terrorism and money laundering activities, when opening an account or commencing any other kind of business with a new customer, each ProCredit bank records and verifies information that identifies that customer, whether a private individual or a legal entity.

Please note: ProCredit bank employees will ask you for your name, address, date of birth and other information that will enable the bank to identify you. The bank will also ask to see documents proving your identity and will ask questions pertaining to the ultimate beneficiary of your transactions and the source of the funds.

PATRIOT ACT Certification

Pursuant to the USA PATRIOT Act and final rules issued by the U.S. Department of the Treasury, a U.S. bank or a U.S. broker-dealer in securities (a "Covered Financial Institution") is required to obtain certain information from any "Foreign Bank" that maintains a correspondent account with it.

As permitted by the final rules, ProCredit banks will gladly provide a PATRIOT ACT Certification for your records. For more information, please contact:

compliance@procredit-holding.com