

AML/CFT & Sanctions Statement

July 2025

ABN AMRO¹ is firmly committed to participating in international efforts to fight against money laundering (ML) and financing of terrorism (FT). We conduct business with integrity and aim to comply to all applicable laws, regulations and standards in each of the countries and jurisdictions in which we operate to ensure the bank conducts business with acceptable clients and deter criminal activities.

AML/CFT

ABN AMRO has implemented a Global Client Acceptance and Anti Money Laundering Policy (further: Global CAAML Policy) to comply with applicable AML/CFT Laws, Regulations and Standards. The Bank's Global CAAML Policy applies to all ABN AMRO entities (i.e. branches and majority owned subsidiaries of ABN AMRO). Where local Laws and Regulations are more stringent, the local Laws and Regulations prevail.

ABN AMRO complies with the Dutch “Wet ter voorkoming van witwassen en financieren van terrorisme” (further: Wwft) globally. The Netherlands is a member country of the Financial Action Task Force (FATF), and has enacted legislation that incorporates the recommendations of the FATF and requirements of the European Union Directives concerning the fight against ML/FT.

The Global CAAML Policy serves to protect ABN AMRO's products and services from being used for ML/FT purposes. The need to know who our clients are, is related to the need to control the risks involved in providing products and services to clients. These risks include, but are not limited to: money laundering, financing of terrorism, fraud, bribery, corruption, tax evasion, capital flight, credit risks and loss of reputation. After all, the Banks' integrity and reputation are determined in part by the integrity and reputation of our clients.

Sanctions

ABN AMRO has implemented a Global Sanctions Policy. The bank's Global Sanctions Policy applies to all ABN AMRO entities (i.e. branches and majority owned subsidiaries of ABN AMRO). In accordance with this Policy, in all countries

¹ ABN AMRO Bank N.V., any of their (in)direct subsidiaries and/or any entities in which ABN AMRO has a stake and/or management control of more than 50%. ABN AMRO has its headquarters at Gustav Mahlerlaan 10, 1082 PP Amsterdam, the Netherlands. The entity is supervised by De Nederlandsche Bank (Dutch Central Bank) and European Central Bank. ABN AMRO Bank N.V. is listed on the Amsterdam Stock Exchange (AEX). Major shareholder is the Stichting Administratiekantoer beheer financiële instellingen, (NL Financial Investments, “NLF”) on behalf of the Dutch State.

where ABN AMRO operates, local Sanctions Law and sanctions lists must be complied with.

ABN AMRO complies with UN and EU Sanctions Regulation globally. In respect of US Sanctions Regulations, ABN AMRO applies US Sanctions Regulations globally where a US element is involved.² Based on its own risk analysis, in some cases the bank applies a more restrictive policy than legally required.

The Global Sanctions Policy serves to protect ABN AMRO's products and services from being used for prohibited transactions and for the purposes of evading, avoiding or otherwise circumventing sanctions or for the proliferation of weapons of mass destruction. ABN AMRO will investigate any breaches of this Policy and take necessary measures in case of non-compliance.

AML/CFT & Sanctions Program

To comply with applicable AML/CFT & Sanctions Laws, Regulations and Standards, ABN AMRO has implemented a Global AML/CFT & Sanctions Program (further: Global Program). The Global Program includes, but is not limited to below pillars:

- Systematic Integrity Risk Analysis (SIRA)
- Global and local AML/CFT & Sanctions policies and procedures
- Customer Due Diligence (CDD) including a risk assessment commensurate with the risks identified and to gain insight into the client's purpose and intended nature of the business relationship.
- Transaction monitoring procedures and systems to identify, assess and report suspicious activities.
- Client screening to identify PEPs, Adverse Media and applicable Sanctions Regulations.
- Transaction screening of cross border transactions for compliance with applicable Sanctions Regulations.
- PEPs and other increased risk clients are always subject to senior management approval.
- Training and Awareness on client integrity risks including, ML/FT and Sanctions risks.
- Additional mitigating measures are in place in case of non-face-to-face CDD.
- Record retention of relevant records (at least 5 years following the end of the business relationship).
- Key controls related to the Global Program to periodically test its effectiveness.

Global and local designated Compliance staff is appointed and is responsible for advising on AML/CFT and Sanctions compliance and the monitoring of the fulfilment of all AML/CFT and Sanctions duties by the Bank as established in the Global CAAML Policy and Global Sanctions Policy.

² US element in this context means a connection or link to the United States or persons within the US. This includes the involvement of for instance US natural or legal persons (including owned or controlled), US goods and US currency
