

## KBC Group Embargo policy information

International organizations and authorities such as the United Nations, the European Union and local or other national authorities can all impose restrictive measures against countries, organizations, legal entities and / or individuals for committing or being suspected of infringement of human rights and international law, acts of crime, terrorism, money-laundering etc. These measures are most commonly referred to as sanctions or embargoes.

KBC Group (further the Group only) has a responsibility towards customers and authorities to conduct business in a lawful and ethical way. Therefore, we will observe laws and binding requirements of applicable laws and regulations, and for reasons of social responsibility, we may also choose to be stricter than legally imposed.

### Embargoes

An embargo is a restrictive measure or sanction on national and/or international level. Although provisions differ by country, person or agency, we distinguish two common types of embargoes:

- Financial embargoes: restrictions related to financial operations and financial resources;
- Trade embargoes: restrictions on the import or export of certain goods or trade with certain countries or parties

CSOB Bank (further Bank only) as a part of the Group complies with financial and trade embargoes issued by the United Nations, the European Union and by the Czech regulations (meaning sanctions that are legally binding for the Czech Republic) as well as with any other embargo issued by the Third Countries that it determines to be relevant such as the USA (OFAC) or the UK. For more information on UN, EU and OFAC sanctions, please click on the respective links below.

Observing embargo regulations means that the Group will not provide funds or economic resources to persons, entities or government agencies that appear on embargo sanction lists or support any kind of transaction with these parties. This not only helps us to avoid penalties for breaching international sanctions; it also helps you, as our customer, manage some of the risks associated with international trade.

Sometimes companies or entities are not explicitly sanctioned, but they may be owned or controlled by individual or entities that are subject to an asset freeze or any financial sanction / restriction, making it prohibited to continue to do any business with them.

The Group has implemented certain screening measures in its different processes to ensure compliance with the applicable restrictions and regulations and with its own policy where this is stricter. As a result, a customer may be requested to provide the Bank with more information or documentation on transactions or counterparties before the Bank can process a transaction or payment. Sometimes, the Group may require a Declaration of Compliance signed by the client.

Both for the Bank and the Group, **it is unacceptable to process payments that may circumvent the imposed sanction regimes and the internal policy rules by intentional or unintentional processing of payments via the intermediary financial institutions and subjects located in other countries** (the so-called indirect payments).

Please note that Correspondent banks also have the right to suspend any transaction in case their monitoring system detects a potential breach of embargoes. In case of suspended transactions, the Group / the Bank act only as an intermediary between the customer and the correspondent bank, without having any influence on the result of their investigation.

In order to avoid complications, customers are advised to contact the bank when considering doing business with countries, persons, entities or government agencies against which restrictive measures have been imposed. For more information on applicable embargoes or on specific Group policies, please get in touch with your Bank contact person, the Client center or any Bank branch.

### **KBC Group specific country policies**

Due to the complexity of individual sanction programs, the Group has decided to go further than the legally applicable sanction programs and to apply a stricter policy with respect to the countries / territories stated below. The Group deems these countries to be more sensitive, for instance because comprehensive or complex embargoes or export control regulations are imposed under UN, EU or the Third Country legislation or regulations, and/or because of the presence of a significant number of blocked individuals or entities. Therefore, please always contact your contact person at the Bank, the Client center, or any branch when you have questions regarding our policy with respect to one of these countries.

Through a thorough screening of the transaction details the Bank wants to make sure that the transaction is legally allowed and within the limits of the Group own policy.

The details for each country policy may change at any given time, due to changing regulations or political circumstances.

#### **Afghanistan**

Following the Taliban takeover of the country and the Afghan state apparatus in particular, KBC has decided that it will no longer process any payment or transaction that is related to Afghanistan.

#### **Belarus**

In relation to the Belarussian support to the Russian invasion to Ukraine, the situation with regard to sanctions is volatile. The sanctions wrt. Belarus are not only very diverse and comprehensive, but the EU and the Third Country sanctions are very different and cover a different range of activities, businesses and trades, persons and entities.

The Group therefore only processes payments for its own customers and after thorough screening of the transaction details, to make sure the transaction is legally allowed and within the limits of the Group's own country policy.

**With effect from 1st June 2023 ČSOB does not process the outgoing payments to Belarus on a comprehensive basis** through any correspondent bank, in any currency.

Incoming payments from Belarus may be further processed unless they are breaching the valid regulation or this policy. The incoming payment processing times can be significantly extended due to the detailed payment verification.

The clients may be asked to cooperate (additional information and documentation may be required).

Be advised that a number of Belarussian banks are subject to sanctions (asset freeze, disconnection from SWIFT network) and the payments from / in favour of these banks cannot be processed any more.

#### **Cuba**

The Group will not process any payments in USD, CAD and GBP that involve Cuban parties.

The Group will only process non-USD, non-CAD and non-GBP payments for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of our own Group policy.

### **Iran**

In light of certain international and local developments with respect to Iran, KBC Group maintains a strict policy. The Group will only process trade related payments and transactions with regard to the export to Iran and only for its own customers, who are active as producers of medicines and / or medical supplies, excluding medical machinery (equipment), as far as the following cumulative conditions are met:

- The customer is a longstanding Bank customer; and
- It does not concern (direct, nor indirect) payments or transactions in USD, CAD or GBP; and
- The transactions are documented in detail; and
- After thorough screening of the transaction details, including all involved parties, it is clear that the transactions are transparent, legally allowed and within the limits of the Group's own internal commercial policy with regard to Iran.

### **Myanmar / Burma**

Besides financial transactions to and from sanctioned persons and entities, all following transactions and related financial transactions are excluded, regardless of the currency: arms and related military goods, dual use (civil, but also military) goods and equipment, technology and software, included in the sanction list and mainly used for monitoring and interception of incoming and outgoing internet and phone communications.

Therefore, a financial transaction regarding Myanmar/Burma will only be processed after thorough screening of the transaction details, to make sure that the transaction is transparent, legally allowed and also within the boundaries of the Group's internal policy regarding Myanmar/Burma.

### **North-Korea**

The Group will not process any payment or transaction that is related to North-Korea.

### **Syria**

The Group will not process any payments in USD, CAD or GBP that involve Syrian parties.

The Group will only process non-USD, non-CAD or non-GBP payments for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of the Group's own policy.

### **Venezuela**

Sanctions on Venezuela are not only very diverse and comprehensive: EU and the Third Country sanctions also cover a range of various types of activities, persons, entities, and currencies.

The Group will not process payments in USD, GBP nor CAD, involving Venezuelan parties.

The Group will only process non-USD, non-GBP or non-CAD payments for its own customers and after a thorough screening of the transaction details to ensure that the transaction is legally allowed and within the limits of the Group's own policy.

More information on sanction regimes in general can be found on the Financial Analytical Office websites:

<https://fau.gov.cz/rozcestnik>

Information on UN, EU, the USA or the UK sanctions can be found on links below:

UN: <https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>

EU: [http://ec.europa.eu/dgs/fpi/what-we-do/sanctions\\_en.htm](http://ec.europa.eu/dgs/fpi/what-we-do/sanctions_en.htm)

US (OFAC): <http://www.ustreas.gov/offices/enforcement/ofac/sdn/>

UK (HMT – OFSI) <https://sanctionssearchapp.ofsi.hmtreasury.gov.uk/>

### **Specific information regarding the embargo policy in relation to the Russian invasion to Ukraine**

In response to the Russian invasion against Ukraine several countries have imposed various economic sanctions, aimed at weakening the Russian economy and limiting the Russia's access to the international financial system.

The KBC Group conducts its business in an ethical and lawful way and complies with all legal requirements imposed by the EU and any other country or authority it deems relevant, such as the US and the UK. Having taken into account the existing contractual commitments and the interests of the clients, the following approach was adopted to the transactions concerning the following areas.

#### **Russia**

With effect from 1st August 2022, the Group does not process the outgoing payments to the Russian federation on a comprehensive basis through any correspondent bank, in any currency.

Incoming payment processing times can be significantly extended due to the detailed payment verification. The clients may be asked to cooperate (additional information and documentation will be required) in verifying payments and their compliance with applicable sanctions and group policies.

Given the volatility of the situation and the vulnerability of the local financial market, the local currency and liquidity of that local currency, KBC Group wishes to remind its customers of the inherent risks associated with all transactions involving Russia, Russian currency and the fact that KBC Group cannot make any guarantees regarding the end-to-end processing of the customer's payments. Our customers may be asked to provide additional information or documentation related to their payments.

Be advised that some entities may not be explicitly sanctioned but may be owned or controlled by a sanctioned subject and therefore considered sanctioned, making it prohibited to continue doing any business with them. The customers are asked to perform a due diligence on their own in this sense.

#### **Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia** regions and the impact on Ukraine as a country

All payments to or from the regions of Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia regions are prohibited and will not be processed.

Apart from these regions, KBC Group will continue to process payments (both open account payments and trade finance transactions) to and from Ukraine for its own customers. Any transaction in breach of sanction regulations or KBC Group's own policy is prohibited and will not be processed.

This amended embargo policy was published on CSOB websites on 13<sup>th</sup> December 2023.