

10 March 2026

Anti-Money Laundering/Combating the Financing of Terrorism Statement

Luxembourg, as a founding member of the Financial Action Task Force on Money Laundering (FATF) and a member of the European Union, is subject to EU regulations governing Anti-Money Laundering and Combating the Financing of Terrorism (“AML/CFT”), as well as governing Sanctions and Proliferation.

Eurobank Private Bank Luxembourg S.A. (the ‘Bank’), incorporated in Luxembourg, is fully subject to the national legal and regulatory framework aimed at the prevention and detection of money laundering and terrorist financing activities. The Bank is regulated and supervised by the Commission de Surveillance du Secteur Financier (“CSSF” or the “Regulator”). Proof of the Bank’s licensing status as a regulated institution can be consulted on the CSSF’s official website: www.cssf.lu.

The Bank ensures strict adherence to all applicable laws and regulations pertaining to AML/CFT, Sanctions and Proliferation, including compliance with the Circulars and Regulations issued by the CSSF.

AUDIT AND MANAGEMENT VALIDATION

In line with the legal framework, the Bank has established a dedicated compliance function responsible for the development and implementation of its AML/CFT, Sanctions and Proliferation program. This program is formally approved by the Authorised Management of the Bank and the Audit Committee, and is ultimately ratified by the Board of Directors.

The external audit firm reviews the program and its implementation on an annual basis. Any findings or issues identified are reported to the regulator, in accordance with applicable requirements.

In addition, the Bank’s procedures and practices are subject to regular audits by an independent internal audit function. In compliance with relevant obligations, the Bank has developed, and continues to enhance, its internal policies and procedures.

POLICIES, PROCEDURES AND MANUALS

The Bank maintains an AML/CFT, Sanctions and Proliferation Risk Appetite Statement and a Policy approved by the Authorised Management, the Audit Committee, and ultimately ratified by the Board of Directors. The Bank also maintains procedures and a Manual approved by the Authorised Management. These documents outline the Bank’s internal control framework for AML/CFT, Sanctions and Proliferation compliance, integrating applicable legal, regulatory requirements, and best practices.

The Board of Directors holds ultimate responsibility for ensuring that an effective framework and control system are in place, allowing for the identification, assessment, and management of money laundering, terrorist financing, and sanctions or proliferation risks.

CUSTOMER DUE DILIGENCE ('CDD')

The Bank applies strict "Know Your Customer" (KYC) and Customer Due Diligence (CDD) principles, which form the cornerstone of its AML/CFT, Sanctions and Proliferation compliance program. This includes the collection and maintenance of adequate information, as well as a continuous understanding of the customer and their activities throughout the entire lifecycle of the business relationship.

The Bank will not establish or maintain a business relationship, nor execute transactions, where the customer's identity, including, where applicable, the identity of beneficial owners, cannot be satisfactorily verified. The Bank ensures that it has a sound understanding of its customers and their respective business activities.

To prevent, detect, and investigate unusual or suspicious transactions related to potential money laundering or terrorist financing, sanctions or proliferation, the Bank retains all client documentation and transaction records for a minimum of five years following the termination of the business relationship.

SPECIFIC ENHANCED DUE DILIGENCE

High risk clients and Politically Exposed Persons (PEPs)

The Bank applies enhanced due diligence measures for high-risk clients and Politically Exposed Persons (PEPs), as well as their immediate family members and close associates. These measures are outlined in the Bank's policies, procedures and Manual, fully aligned with applicable legal, regulatory obligations and industry best practices.

Shell banks

The Bank strictly prohibits the establishment of relationships with "shell banks," defined as foreign banks with no physical presence in any jurisdiction and that are unaffiliated with any regulated financial group.

COOPERATION WITH AUTHORITIES AND SUSPICIOUS ACTIVITY OR TRANSACTION REPORT

In the context of money laundering and terrorism financing prevention, as well as compliance with proliferation, sanctions and restrictive measures, the Bank operates a real-time transaction monitoring system. This system screens all sender and receiver data against Worldcheck national and international sanctions lists, including those issued by the United Nations, the European Union, OFAC, CSSF, HM Treasury, BIS, and DFAT.

Customer data is also subject to daily name screening against the Worldcompliance and the Worldcheck databases through the Bank's Customer Data Management application.

The Bank fully cooperates with governmental and law enforcement authorities, in compliance with applicable privacy and data protection laws. Upon request and subject to legal authorisation, customer information and documentation may be made available to the competent authorities.

In exceptional circumstances requiring disclosure of the identity and holdings of direct or indirect holders or beneficial owners, the Bank may release the relevant information to authorised counterparties.

BRANCHES AND SUBSIDIARIES

As required by law and regulation, the Bank's AML/CFT, Sanctions and Proliferation policies, procedures and Manual apply equally to its branches and any future entities falling under the scope of the Bank's operations.

AML/CFT TRAINING

All employees, including members of the management body and Authorised Management, are required to complete AML/CFT, Sanctions and Proliferation training annually. This ensures that all staff maintain appropriate awareness, tailored to their specific roles and responsibilities.

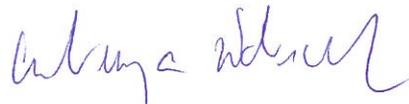
New employees must complete such training within 30 days of joining the Bank.

CONCLUSION

This statement reflects the current legal and regulatory obligations incumbent upon the Bank. The Bank reserves the right to amend its AML/CFT, Sanctions and Proliferation policies, procedures and Manual at any time in order to ensure continued compliance with evolving legal, regulatory, and professional standards.


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Chief Compliance Officer

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