

Group Customer Acceptance Policy

1. Purpose

The purpose of this Policy is to provide guidance and clarity on customer acceptance and to ensure compliance with all applicable legal and regulatory requirements.

2. Sectors Affected

The Policy applies to all Group Entities.

All entities must, as a minimum, meet the requirements set out in this Policy. In any country where the requirements of applicable law(s), directives or practices establish a higher standard, Entities must meet those standards. In the case where current local laws conflict with this policy, the respective local Compliance/AML Unit must liaise with the AMLCO of the parent company of the Group, so as to resolve the issue.

All BOC subsidiaries are expected to enact in their own internal systems equivalent procedures.

3. Customer Acceptance Principles

The evaluation of a customer's risk is fundamental to the Bank's effort to prevent and suppress money laundering, terrorist financing and other illegal activities.

The Bank reserves its right to deny the establishment of any business relationship with a person (physical and/or legal) assessed to fall within the groups of not accepted customers described below or indeed if for any reason the Bank is uncomfortable with the establishment of a business relationship.

The Bank of Cyprus Customer Acceptance Policy ("CAP") is designed to ensure that the Bank adequately assesses prospective and existing customers from an AML/CTF perspective in order to ensure that it establishes and maintains relationships with customers with no ML/TF relationships or transactions. In parallel, the CAP covers areas outside the Bank's risk appetite, where a business relationship cannot be accepted.

BOC and its subsidiaries transact only with customers meeting minimum risk assessment criteria and without significant failure, as described below.

4. Customer Risk Assessment Scorecard

To this extent, the Bank has adopted the use of a scorecard to determine the risk level of prospect and current customers. The scorecard uses various criteria such as:

- **Geography Risk Factors:** Scoring is allocated based on the geographical risks associated with each customer. If the entity is an individual, then s/he will be scored for both his/her ID/Passport Country and his/her Country of Residence. In the case of a legal entity, several factors are considered, including the legal entity's Country of Registration and Country of Economic Activity, as well as the Country of Residence and the Country of ID/Passport of all its Ultimate Beneficial Owners, Shareholders, Directors, and Signatories.
- **Destination / Origin of Wire Transfers:** Scoring is allocated based on the geographical distribution of the customer's wire transfer activity.
- **Transactional Risk Factors:** Scoring is allocated based on the total turnover (Debit or Credit) of the customer.
- **Customer Risk Factors:** Scoring is allocated based on certain characteristics associated with the customer. In the case of individuals, scoring is allocated in the case the customer is a PEP/PEP related, if s/he is associated with Negative Media, based on the length of his/her relationship with the Bank, or if s/he is a sole proprietor with heavy cash business. In the case of legal entities, scoring is allocated in the case the legal entity is associated with a PEP, in the case the legal entity is associated with Negative Media, in the absence of audited accounts, in the case the legal entity is part of a complex structure, if nominee shareholders are included in the legal entity's structure, or in the case the business is associated with heavy cash turnover.
- **Product Risk:** Scoring is allocated based on the type of products the customer has. Certain products such as investment portfolios, respondent accounts and loans guaranteed with cash, carry a higher risk score.
- **Distribution Channel Risk:** Scoring is allocated based on the method of on-boarding the customer. Higher score is attributed if the customer was introduced to the Bank by a Professional Intermediary or if s/he is a distance customer.
- **Behavior Risk Factors:** Scoring is attributed based on several behavioral aspects of the customer such as the need to monitor his/her transactions, number of inquiries received from Correspondent Banks for the customer, or whether there is a significant deviation between the customer's established declared turnover in his/her bank accounts, compared to the actual.
- **Employment Type:** The customer's employment type is considered for the scoring.
- **Industry Factors:** The industry in which the customer is involved is considered for the scoring.
- **Legal form:** If the customer is a legal entity or a legal arrangement, the type of the legal entity / arrangement is considered for the scoring.

The above criteria are used in combination, in order to determine the risk level of each customer. Customers, based on the score reached by their characteristics, can be categorized as:

- Not Accepted (see Appendix 1)
- Critical Risk / High Risk (see Appendix 2)
- Significant Risk
- Moderate Risk
- Low Risk

5. List of conditions under which a business relationship with an existing client must be terminated

The Bank may terminate a business relationship with an existing customer if the following conditions apply:

1. If he was initially introduced by an approved professional intermediary and a subsequent meeting did not take place with Bank staff.
2. If, during the review / customer update process, the customer fails or refuses to provide vital information requested by the Bank.
3. If a court order by the local authorities has been issued against a customer, resulting in an unacceptably increased ML/TF risk associated with the customer.
4. If the customer's activities change, and the new activities fall within the Bank's non-accepted types of business.
5. If a customer was convicted for any serious predicate offence.
6. If a customer has attempted to deceive the Bank.

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Appendix 1 - Examples of Entities (Individuals or Legal Entities), Accounts, or Transactions Not Accepted by BOC and related entities

Important Notes:

1. BOC has decided that the risk associated with certain groups of customers is unacceptably high and has, therefore, decided not to establish a business relationship with them. In the case of vendors, the same principles apply. Apart from the requirements of the Law and the Directive, the Bank, as part of its Risk Appetite Assessment, has included in this category other types of customers based on the ML / TF risk associated with them.
2. The categorization of a customer as Not Accepted is based on the overall score assigned by the automated scorecard, considering all risk parameters. To that effect, the below list is not an exhaustive list of Not Accepted customer types.
3. For Countries Categorization, please refer to Appendix 3.
4. The automated scorecard incorporates parameters / examples as described below which can be implemented systemically. To that effect, some of the below parameters / examples, which cannot be implemented systemically, should also be considered in the overall risk assessment of clients.

An Entity is considered Not Accepted if it:

1. Carries out illegal activities (such as human trafficking, drug dealing, child pornography, pedophilia, fraud, etc.).
2. Is convicted for a crime included in the predicate offences covered under the relevant Law in each jurisdiction.
3. Fails to provide adequate identification information or to disclose its financial operations.
4. Is a shell company, a shell bank or a bank which deals with shell banks or shell companies.
5. Is a terrorist or deals with terrorist activities (such as financing terrorist activities etc.).
6. Requests to have accounts in the name of anonymous or fictitious persons.
7. Is from a political regime not recognized by the United Nations.
8. Is subject to specific sanctions (i.e. EU, UN, OFAC, local lists), including close family members, close associates and related entities (irrespective of the percentage of ownership, either direct or indirect, held by the entities subject to sanctions).
9. Is acting on behalf of or dealing/trading with any sanctioned person or is involved in any sanctioned activity.
10. Is an individual customer whose Country of Residence is a Country included in Categories A, A1 or A2. Existing customers will remain until final closure of accounts is possible.
11. Is an individual customer whose ID / Passport Country is a Country included in Category A.
12. Is a legal entity whose Country of Registration or Country of Economic Activity is a Country included in Categories A, A1 or A2.

13. Is a legal entity where the Country of Residence of any of its Directors, Signatories, Shareholders (=>25%) or Beneficial Owners (=>25%) is a Country included in Categories A, A1 or A2. Existing customers will remain active until final closure of accounts is possible.
14. Is a legal entity where the Country of ID / Passport of any of its Directors, Signatories, Shareholders (=>25%) or Beneficial Owners (=>25%) is a Country included in Categories A and A1. Existing customers will remain active until final closure of accounts is possible.
15. Is a foreigner who invests in Cyprus to obtain the Cyprus citizenship, whose source of funds/wealth cannot be established, or the process for obtaining the Cyprus citizenship is not through persons registered as Service Providers under the Cyprus Investment Program
16. Is a legal entity with bearer shares or has a provision to issue bearer shares.
17. Is a customer who falls in the following categories:
 - Is a Non-face to face customer¹ from,
 - Is a Politically Exposed Person (PEP) from,
 - Is a trust established in,
 - Is a Foundation for business or private purposes registered in,Category A, A1, A2 or B Countries.
18. Is a Politically Exposed Person (PEP), for whom the source of wealth cannot be determined or the reasoning of establishing a business relationship is not clear.
19. Is a trust:
 - Which is governed by the Cyprus Legal framework but is not registered in the Cyprus Register of Trusts, or
 - Whose ultimate beneficial owners are not determined (discretionary trust), or
 - Whose purpose is not compatible with the business activity/economic profile of the account holder, or there is no legitimate economic reason for its establishment.
20. Operates in the following high-risk industries and is not regulated/licensed in a Category F Country: (a) Casinos, (b) Betting Houses, (c) Prize Competitions, (d) Financial Services Firms, or Brokerage Firms (e) Banking or Insurance Institutions², (k) Armed Security Services , (l) Defense/Arms/Military Industry, (m) Credit Acquiring including Asset Management for the purpose of acquiring credit facilities from credit institutions.
21. Operates in the following high-risk industries and is not registered in a Category F Country: (a) Precious metals/stones³, (b) Pawn shops, (c) Sporting / Hunting / Antique guns, (d) Internet Gaming other than electronic gambling, (e) Trading of art collection.

¹ Customers met in person by staff within the Group do not fall in the non-face-to-face category

² Holding/other companies which belong to a group involved in any non-accepted activities as described above, are also not accepted, except for customers operating in the industries described in 20 (e). In such a case, all entities in the group must be treated as High Risk

³ Conglomerate/well established companies (substantiated through independent sources) that are in the mining/ exploration of gold and other precious metals industries from counties not included in Category F can be accepted and treated as high risk customers

22. Is an Online Gambling company (including related services⁴ such as software providers, payment processing services, card acquirers) which is not regulated in a Category F Country. Additionally, Online Gambling companies are not permitted to open client accounts.
23. Is a Payment Institution or an Electronic Money Institution (MSB) (including MSBs providing Money Transmission Services and Currency Exchange Services) which is not regulated in a Category F Country.
Generally, MSBs regulated in Category F Countries can maintain only corporate accounts, to be utilized solely for the processing of administration expenses.
Exceptionally, for a limited selective list of clients, a client account may be opened in any of the following cases:
- For MSBs whose activities are limited to the transmission of funds for physical persons serviced in Cyprus.
 - The AML Risk assessed is considered low based on the client's business profile and provided that no restrictions are imposed by our major correspondent banks.
24. Operates in the following Not Accepted Industries: (a) Online Casinos, (b) Online Pharmacies, (c) Trading in Binary options, (d) Dating, (e) Adult Entertainment, (f) Fortune Telling, (g) Medium activities, (h) Issuers or Dealers of Virtual Currency (e.g. Bitcoin) or involved in converting traditional currency in virtual currency or vice versa, including related services (software providers, payment processing services, card acquirers), (i) Military Missions, and (j) Production and/or Wholesale Trading of Nuclear Related Raw Materials, Products and Services.
25. Is a fund, whose risk, based on the manual 'Scorecard of Investment Funds' is determined to be Not Accepted.
26. Is a legal entity with a complex structure, where there is no transparent and legitimate economic reason for its complexity
27. Is a foreign government organization of a country not included in Category F and there is no reasonable ground/business justification for establishing such a business relationship.
28. Is a non-Profit Organisation or Charity or Foundation for charity purposes, which is either:
- not registered/established and operating in Cyprus or
 - registered/established and operating in Cyprus but is not reputable and well known

Exceptionally, a business relationship could be established with a limited selective list of the aforementioned entities registered/established and operating in a Category F Country, provided that they relate to very reputable global organizations, and there is a justifiable need for operating a bank account in Cyprus.

The above provisions also apply to clients who are ultimately owned by more than 50% by Non-Profit Organizations or Charities or Foundations set up for charity purposes.

29. Is introduced by a Professional Intermediary who is:
- not subject to mandatory professional registration, recognized by law, or

⁴ If the online gambling company they are cooperating / associated with, is not regulated in a Country included under Category F

- not regulated in a Category F Country, or
- regulated in a Category F Country but is not approved by the AMLCO.
- Relies on a series of more than one associate for the customer identification

30. Is introduced by a Professional Intermediary but has not been met in person before the opening of accounts.

31. Is a Correspondent / Respondent Bank which:

- Is not regulated, or
- Does not apply adequate AML procedures/measures, or
- Does not have a policy that covers the monitoring of the business relationship with PEPs or
- Is not regulated in an EEA Country and for which an investigation for AML/CTF purposes has been conducted or is in progress by the authorities of the country of incorporation or origin, or on which significant fines/sanctions have been imposed by the local authorities (FIU, Regulator), or
- There is a strong belief that the correspondent or the respondent bank is involved in money laundering

Examples of Not Accepted Types of Accounts

- Nested Accounts
- Payable-through-accounts
- Customer Accounts in the name of Professional Intermediaries rejected by the AMLCO
- Fiduciary Deposits Accounts on behalf of Credit Institutions not regulated in a Category F Country
- Omnibus accounts (concentration accounts)
- Accounts in USD for Persons connected⁵ with countries in Appendices 2&3 of the Bank's Sanctions Policy
- Accounts in USD or CAD for Online Gambling (including related services) Companies and irrespective if the customer operates in or is regulated in a Category F Country

Examples of Not Accepted Types of Transactions

- The undertaking of transactions with customers resident⁶ in countries included in Appendices 1,2 and 3 of the Sanctions Policy, that can create credit exposure to the Bank.
- The processing of wire transfers in any currency from /to Banks established in countries included in Appendices 2&3 of the Sanctions Policy.
- The processing of wire transfers in USD to / from Latvia, Estonia, Georgia or Armenia.
- The processing of wire transfer in USD (or involving US Correspondent Banks), either (i) for Persons connected⁸ with countries in Appendices 2&3 of the Sanctions Policy, or (ii) involving countries in Appendices 2&3 of the Sanctions Policy.
- The processing of wire transfers in any currency relating to:
 - third party lending / assignment of loans and any other similar types of financing, between parties who do not belong to the same group of companies and where the main

⁵“Persons Connected” covers (i) For Individuals: Country of Residence / ID / Passport, (ii) For Legal Entities: Country of incorporation, or country of Residence / ID / Passport of Directors, Signatories, Shareholders or Beneficial Owners, (iii) any natural or legal person, entity or body operating in a sanctioned country, (iv) the government/state of a sanctioned country or any public authority thereof.

⁶In the case of legal entities, the term “resident” refers to the country of registration or economic activity, or the country of residence of any of the directors, signatories, shareholders or beneficial owners.

activities of the party lending the money are not related to the financial sector, with the exception referred to in Appendix 2.

- financing in the form of promissory notes.
 - intra-group loans / assignment of loans and any other similar types of financing between entities which are included in the Sectoral Sanctions List (SSI List) in any currency.
 - consultancy services where there is no adequate information/appropriate documentation regarding the professional expertise of the consultant (such as educational qualifications/ relative working experience), the reasonableness/adequacy of the agreement between the parties, as well as the reasonableness of the fee.
 - buying or selling of virtual currency.
 - investments in Cyprus by foreigners, in order to obtain the Cyprus citizenship, whose source of funds/wealth cannot be established, or where these transactions are not through persons registered as Service Providers under the Cyprus Investment Program.
 - counterparties subject to specific EU, U.S. and U.N sanctions, including related entities with ownership (directly or indirectly) equal or over 50%.
- The provision of Downstream Correspondent Clearing Services

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Appendix 2 - Examples of High-Risk customers (individuals and/or legal entities)

Important Notes:

1. The following categories of customers are designated as high risk subject to enhanced due diligence measures, as prescribed by:
 - The Law or the Directive of the Central Bank of Cyprus:
 - Politically Exposed Persons (“PEPs”)
 - Complex or unusually large transactions or unusual types of transactions
 - “Client accounts” in the name of third persons.
 - Foundations and Trust Accounts
 - Correspondent/respondent relationships with banks not regulated in the EEA.
 - Transactions with parties in high risk countries.
 - The Bank, in accordance to its risk appetite on ML and TF risk.
2. The categorization of a customer as High Risk is based on the overall score assigned by the automated scorecard, considering all risk parameters.
3. For Countries Categorization, please refer to Appendix 3

Examples Geography Risk Factors, which, considered on their own, classify a customer as High Risk

- Individuals whose ID / Passport Country is a Country included in Category A1⁷
- Individuals whose Country of Residence is a Country included in Category B.
- Legal entities whose Country of Registration or Country of Economic Activity is a Country included in Category B.
- Legal entities where the Country of Residence of any of its Directors, Signatories, Shareholders (=>25%) or Beneficial Owners (=>25%) is a Country included in Category B.

Examples of Customer / Legal form Risk Factors, which, considered on their own, classify a customer as High Risk

- Legal entities with complex corporate structures, provided there is a transparent and legitimate economic reason for their complexity.
- Foreign government organizations and Embassies of countries other than the ones included under Category F, provided there is reasonable ground/business justification for establishing a business relationship
- Persons associated with negative media related to ML/TF (the negative media identified need to be classified as High Risk)
- Foreigners who invest in Cyprus in order to obtain the Cyprus citizenship

Examples of Employment /Economic Activity Risk Factors, which, considered on their own, classify a customer as High Risk

- Customers involved in the Production and/or Wholesale Trading of (i) Petroleum Products, such as oil and petrol, (ii) Energy such as natural gas, CO2 emissions or wind power.
- Customers operating in the following high-risk industries, provided they are regulated/licensed in a Category F Country: (i) Online Gambling (including related services such as software providers, payment processing services, card acquirers), (ii) Casinos (excluding online casino games), (iii) Betting Houses, (iv) Financial, Brokerage or Insurance Services Companies, (v) Payment

⁷ If the individual is also resident in a Category A1 Country, then s/he is considered Not Accepted

- Institutions and Electronic Money Institutions (including MSBs providing Money Transmission Services and Currency Exchange Service), (vi) Organizations providing Armed Security Services,
- Customers operating in the following high-risk industries, provided they are registered in a Category F Country: (a) Precious metals/stones⁸, (b) Pawn shops, (c) Trading of art collection.
 - Non-Profit organizations, Charities and Foundations set up for charity purposes, provided that are (a⁹) reputable and well-known charities established/registered and operating in Cyprus or (b⁹) registered in a Category F Country and provided they relate to very reputable global organizations, and there is a justifiable need for operating a bank account in Cyprus.
 - Funds, whose overall risk score, based on the manual ‘Scorecard of Investment Funds’ is determined as high risk.
 - Foundations for business or private purposes, if they are not registered in a Category A, A1, A2, B country

Examples of Product Risk Factors, which, considered on their own, classify a customer as High Risk

- Private banking customers
- Fiduciary Deposits from reputable credit institutions regulated within a Category F Country

Types of Transaction treated as High Risk

- Transactions relating to foreigners who invest in Cyprus to obtain the CY citizenship.

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⁸ Conglomerate/well established companies (substantiated through independent sources) that are in the mining/ exploration of gold and other precious metals industries from countries not included in Category F can be accepted and treated as high risk customers

⁹ The provisions for points (a) and (b) also apply to clients who are ultimately owned by more than 50% by Non-Profit Organizations or Charities or Foundations set up for charity purposes.

Appendix3 – Country Risk Categorization

The Geography Risk Factors used by the scorecard to determine the risk level of prospect and current customers, derive from the Country Risk Categorization Methodology, which assesses the ML/TF risk emanating from each country and geographic area.

The ML/TF risk of each country is based on several indexes and standards available, as well as the opinion of the AAMLCO. Examples of such indexes and standards include the Basel AML Index Report, the Corruption Perception Index, FATF/Moneyval Public Statements, EU List of High-Risk Countries, EU/OECD List of Non-Cooperative Jurisdiction for Tax Purposes, Sanctions imposed by OFAC/EU/UN.

The country risk categorization is utilized for the purposes of the score card to assign scores for geography risk factors. Individuals are scored based on their Country of Residence and their Country of ID / Passport. Legal entities are scored based on the Country of Registration, Country of Economic Activity, as well as the Country of Residence and ID/Passport Country of their Directors, Signatories, Shareholders (=>25%) and Beneficial Owners (=>25%). Scores are also assigned based on the country of origin / destination of wire transfers.

Countries fall within the following ML/TF categories:

- Category A: Countries included in Appendix 3 of the Sanctions Policy and Dissolved Jurisdictions/Countries
- Category A1: Countries included in Appendix 3 of the Sanctions Policy.
- Category A2: Countries included in Appendix 2 of Sanctions Policy.
- Category B: Countries with High Risk profile/characteristics including, among others, countries with significant deficiencies as per FATF, and countries included in the EU/Moneyval list of high-risk countries.
- Category C: Countries near war zones and/or near jurisdictions with connections with known terrorist organisations or associated with Significant Negative Media regarding ML/TF Deficiencies
- Category D: Countries as per Compliance Division' Country Methodology, which takes into consideration various Indexes (e.g. Basel, CPI, FSI)
- Category E: Moderate Risk Countries
- Category F: Countries which entail the lowest ML/TF risks, including, among others, EEA countries.

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