

RBI GROUP ANTI-MONEY LAUNDERING DECLARATION

Preamble

RBI is one of the leading banks in Austria and Central and Eastern Europe. As a financial institution, RBI actively supports the economic and social development of the countries and economies of this economically closely interwoven and globally networked region by providing access to international markets through its correspondent banking services.

"What one can't do alone, many can." Friedrich Wilhelm Raiffeisen's motto particularly applies to the fight against money laundering and crime in international payment transactions. Since the 1990s, the EU has been regulating money laundering prevention with directives that the member states implement into different national laws. Most credit and financial institutions in Europe have invested a lot of money and resources in money laundering prevention in recent years. Despite comprehensive regulatory and organizational efforts at all levels, credit and financial institutions are still too often misused for the purpose of money laundering and terrorist financing, especially in international payment transactions.

The signatories of this declaration want to change this sustainably by consistently complying with and further developing their own prevention measures, by proactively engaging with the legislator for a stronger AML legal framework, as well as by intensifying efficient and effective cooperation with all institutions and organizations active in the fight against money laundering. They are committed to the following principles.

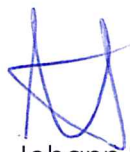
Principles

1. The signatories declare that they will do everything in their power to contribute to the prevention of money laundering and the financing of terrorism within their own areas of responsibility.
2. In concrete terms, the signatories commit themselves to the following targets in their own areas of responsibility:
 - a. **Offshore clients:** We will significantly and sustainably reduce the share of offshore customers in our portfolio.
 - b. **Correspondent banking relationships:** We will further follow our internally established framework, ensuring guidance on entering and continuing correspondent banking relationships. Thus, by the end of 2021 we will terminate business relationships with over 130 partners and substantially limit so called nested payments (these are payments that do not come directly from our customers, but from customers of the correspondent banks of our correspondent banks). Only a maximum of ten reputable international correspondent banks will be entitled to transfer nested payments via RBI from 2022 onwards. Moreover, we only have direct correspondent banking relationships with solid financial institutions.
 - c. **Customers with a high reputational risk:** We will consistently accomplish our portfolio clean-up and will not enter new business relationships with customers without a flawless reputation.

d. **Investment in compliance:** We have already invested substantial amounts of resources into our compliance systems and we will continue to do so. State-of-the-art compliance system and their continuous improvement help to meet legal and societal expectations by remaining trustworthy and secure.

e. **Support of legislative initiatives:** We step up the fight against money laundering in Europe, because measures adopted by banks must be based on a sound legal framework. The aim is to prevent the proceeds of illegal transactions finding their way into the legal financial cycle.

3. The signatories obviously commit themselves to comply with all international and national laws and regulations to combat money laundering and terrorist financing and to further expand their own money laundering prevention measures. They also commit themselves to actively participate in the national and international discourse and legislative processes regarding improving anti-money laundering systems.
4. The signatories are aware that no amount of effort of individual financial centers and individual financial institutions will be sufficient to cope with the ever-changing forms and patterns of international money laundering and terrorist financing. The signatories therefore support all measures that lead to improved cooperation between all organizations involved in the fight against money laundering and terrorist financing.
5. The declared aim of the signatories is to achieve greater efficiency and improved proactive measures to combat money laundering and terrorist financing by cooperating closely with authorities, other financial institutions and national and international experts. This is to be achieved through an improved exchange of information on methods, suspicious transaction patterns and new types of crime that have been jointly identified.



Johann Strobl
Chief Executive Officer



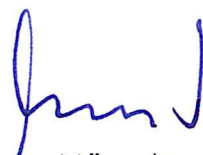
Andreas Gschwentner
Chief Operating Officer/
Chief Information Officer



Lukasz Januszewski
Markets & Investment Banking



Peter Lennkh
Corporate Banking



Hannes Mösenbacher
Chief Risk Officer



Andrii Stepanenko
Retail Banking