



General Compliance Statement relating to the Prevention of Money Laundering and the Financing of Terrorism

1. Professional Registration recognized by local law

DNB Luxembourg S.A. (hereafter "The Bank") is established in Luxembourg and subject to the supervision of the Commission de Surveillance du Secteur Financier (the CSSF) as a Bank authorised to carry on their activities pursuant to Article 2 of the Law of 5 April 1993 on the Financial Sector (license nr B00000143)

The Bank is submitted to and complies with the Luxembourgish laws and regulations for the prevention of money laundering and terrorism financing including but not limited to the Law of 12 November 2004 on the fight against money laundering and terrorist financing (the 'AML/CTF') as amended as well as the CSSF Circulars and Regulations on that subject.

2. Governance

The Bank has implemented a permanent and independent compliance function that ensures, in particular, that the fight against money laundering and terrorist financing translates into effective AML/CTF framework that includes risk-based policies, controls and measures. The implementation of this framework is subject to yearly internal and external audit whose findings are reported to the CSSF.

3. Staff

The Bank verifies the identity of all staff members and ensures on an ongoing basis that they are not subject to restrictive measures in financial matters.

The Bank ensures that all staff members including Board Members and Authorized Management receive ongoing risk-based training on the prevention of money laundering and terrorism financing.

4. Customer Due Diligence

The Bank has Due Diligence procedures in place and performs the verification of identity of all its customers according to the AML/CTF laws and regulations in Luxembourg and DNB Group standards, which comply with EU regulations. Risk-based Customer Due Diligence – including on



Beneficial Owners where relevant - is performed before entering into business relationship and on an ongoing basis.

5. Retention of data, information and documentation

The bank retains the data, information and documents collected under Customer Due Diligence measures within limits and requirements prescribed by Luxembourg laws and regulations and make them available for inspection by competent authorities and auditors.

6. Cooperation with the Authorities

The Bank has procedures and controls in place that allow to ensure that no funds are made available to States, persons, entities or groups subject to restrictive measures in financial matters. The Bank monitors all customers' transactions and activities on an ongoing basis and ensures that all suspicions of money laundering, an associated predicate offence or terrorist financing are reported to the FIU. The Bank cooperates with all relevant authorities and comply with any request for information thereof in accordance with AML/CTF and data privacy laws and regulations.

Luxembourg, 29 October 2024

A handwritten signature in blue ink, consisting of a series of loops and a horizontal line, positioned above the name of the signatory.

Anne Bozet
Chief Compliance Officer
DNB Luxembourg S.A.