



CONCEPT OF PROTECTION AGAINST MONEY LAUNDERING AND TERRORIST FINANCING

Finax, o.c.p., a.s., with its registered seat at Bajkalská 19/B, Bratislava - Ružinov 821 01, identification number (IČO): 51 306 727, registered in the Business Register of the Municipal Court Bratislava III, Section Sa, Insert No. 6713/B (hereinafter referred to as "Finax") has adopted measures to meet its obligations to prevent money laundering and terrorist financing in accordance with the relevant legislation, in particular Act No. 297/2008 Coll. on protection against money laundering and terrorist financing and on the amendment and supplementation of certain acts, as amended, and the methodological guidelines. Finax seeks to prevent being misused for money laundering and terrorist financing purposes by complying with legal obligations, including customer identification, analyzing and monitoring payment transactions. To this end, Finax has adopted its own Anti-Money Laundering and Combating the Financing of Terrorism Programme, which is worked out as an internal regulation, available to all employees.

1. Organizational and personnel provisions

The overall protection against money laundering and terrorist financing is the responsibility of the Finax Board of Directors. Furthermore, the Board of Directors of Finax has designated a person and his/her deputy who is responsible for carrying out routine activities designed to implement measures to prevent money laundering and terrorist financing, including the reporting of unusual business transactions. The Compliance Officer shall also monitor compliance with the Programme and internal regulations and procedures for protection against money laundering or terrorist financing.

2. Due diligence in relation to clients and transactions monitoring/control system

When entering a business relationship, Finax applies a risk-based approach to the client and exercises due diligence in applying the "know your customer" principle. To this end, Finax ascertains information about the client (data necessary to identify and verify the client, the end-user of the benefits, including ascertaining the ownership structure and management structure of the client, provided it is a legal entity or a fund entity) as well as the purpose of the business relationship/transactions. Finax ascertains whether the client is a politically exposed person or is included on international sanctions lists. During the contractual relationship, it conducts further checks and continues to monitor the transactions. For this purpose, Finax may, in particular, request additional explanations and information from the client as well as relevant documentation. If Finax is unable to exercise the necessary diligence in relation to the client (e.g. the client refuses to submit to identification), Finax is obliged to refuse to enter a business relationship, terminate the business relationship, or refuse to execute a specific trade. Transactions that are judged to be unusual are reported to the financial intelligence unit.

3. Employee training

Finax employees are trained in the area of money laundering and terrorist financing before starting to carry out work activities as well as regularly once a year.