

PROGRAM ZA SPREČAVANJE PRANJA NOVCA ERSTE BANK A.D. NOVI SAD

Erste Bank a.d. Novi Sad (*u daljem tekstu označena skraćenicom EBNS*) ima sedište u Novom Sadu, Bulevar oslobođenja 5. EBNS posluje pod nadzorom Narodne Banke Srbije.

Erste Bank a.d. Novi Sad posluje u skladu sa odredbama Zakona o sprečavanju pranja novca i finansiranja terorizma koji je usvojila Narodna Skupština Srbije ("Sl. glasnik RS", br. 20/2009,72/2009, 91/2010, 139/2014). Poslovanje Banke takođe je u potpunosti usklađeno sa svim podzakonskim aktima donetim na osnovu ovog zakona, kao i sa standardima Erste Grupe definisane Politikom sprečavanja pranja novca, upoznaj svog klijenta i FATCA regulative.

Cilj EBNS je da bude usklađena kako sa odredbama važećih domaćih zakona, direktivama EU i uredbama, kao i sa najboljom međunarodnom praksom kako je predviđeno u regulativi Radne grupe za finansijske mere u borbi protiv pranja novca (FATF) i dokumentima drugih međunarodnih tela kao što je Odbor Basel ili Wolfsberg Grupa. U skladu sa navedenim EBNS je kao AML/CTF ključna područja definisala: pristup zasnovan na rizicima, obaveze analize klijenata, dokumentacija (baza podataka), izveštavanje o sumnjivim aktivnostima i obuku i trening zaposlenih.

EBNS je postupila u skladu sa svojim zakonskim obavezama i implementirala je sopstveni AML- KYC-program (set internih akata za sprečavanje pranja novca i finansiranje terorizma) koji sadrži i striktna pravila za sprečavanje, otkrivanje i prijavljivanje tzv. sumnjivih poslovnih transakcija koje ukazuju na moguće pranje novca i finansiranje terorizma.

EBNS je implementirala sisteme za identifikaciju klijenata koji obezbeđuju odgovarajuću identifikaciju klijenata Banke. Što više znamo o našim klijentima, njihovom istorijatu i poslovnim aktivnostima, efikasnije ćemo prepoznati sumnjive transakcije i odvojiti ih od uobičajenih transakcija klijenata, te tako izbeći potencijalno pranje novca. Zahvaljujući tome, EBNS gradi poslovni odnos sa klijentima koji se zasniva na punom poverenju, sigurnosti i transparentnosti.

Za svrhe prepoznavanja mogućih sumnjivih transakcija i lica, EBNS koristi sistemsko rešenje – aplikativnu podršku koja omogućava Banci da kontinuirano prati i prepoznaje moguće pranje novca i finansiranje terorizma. Putem aplikativne podrške integrišu se transakcioni podaci sa informacijama o korisnicima što kao rezultat daje kompletan pregled aktivnosti - u okviru sistema i omogućava precizno i tačno otkrivanje sumnjivih aktivnosti.

U skladu sa Procedurom „Upoznaj svog klijenta“ i implementiranim Zakonom o sprečavanju pranja novca i finansiranja terorizma, EBNS ne ulazi u poslovni odnos, niti obavlja bilo kakvu transakciju po zahtevu klijenta koji je odbio postupak identifikacije, te ako nedostaju potrebne informacije o prirodi i svrsi te transakcije ili ukoliko iz bilo kojih drugih razloga nije moguće do kraja sprovesti postupak analize klijenta (Due Diligence).

EBNS takođe ima ustanovljenu odgovarajuću politiku koja pokriva odnose sa politički izloženim licima i koja je dosledna najboljim međunarodnim praksama u oblasti sprečavanja pranja novca.

Erste Bank a.d. Novi Sad ne uspostavlja korespodentske odnose sa šel bankama, niti svojim klijentima dozvoljava direktnu upotrebu korespodentskog računa ili korespodentskog podračuna radi poslovnih transakcija u njihovo ime (npr. prelazni računi).

EBNS vrši redovnu obuku zaposlenih u oblasti sprečavanja pranja novca i finansiranja terorizma. Ova obuka uključuje identifikaciju i prijavljivanje transakcija koje smo po zakonu obavezni da prijavimo odgovarajućem regulatornom telu-Upravi za sprečavanje pranja novca, različite primere pranja novca koji su u praksi usko povezani sa određenim bankarskim proizvodima i uslugama, kao i adekvatno objašnjenje odredbi internih akata za sprečavanje pranja novca.

**ANTI-MONEY LAUNDERING PROGRAM IMPLEMENTED
BY ERSTE BANK A.D. NOVI SAD**

Erste Bank a.d. Novi Sad (*hereinafter referred to as EBNS*) has the registered office in Novi Sad, Bulevar oslobođenja 5. EBNS is under the supervision of the National Bank of Serbia.

Erste Bank a.d. Novi Sad operates in line with the provisions adopted by the National Assembly of the Republic of Serbia in the Law on the Prevention of Money Laundering and the Financing of Terrorism ("Official Gazette of the Republic of Serbia", no. 20/2009, 72/2009, 91/2010, 139/2014). EBNS is also fully complied with other by-laws passed based on this act, as well as with the standards of Erste Group, defined by Anti-Money Laundering, Know-Your-Client and FATCA Regulation Policy.

The objective of EBNS is to be complied with both the regulations of the current domestic laws, EU directives and regulations, as well as with the best international practice, as stipulated in the regulation of the Financial Action Task Force on Money Laundering (FATF) and the documents of other international authorities such as Basel Committee and Wolfsberg Group. In accordance with the stated, EBNS has defined the following as AML/CTF key areas: the risk-based approach, liabilities of due diligence, documentation (database), reporting on suspicious activities and education and training of the employees.

EBNS has acted in accordance with its legal liabilities and implemented its own AML-KYC Program (set of internal acts for the prevention of money laundering and financing of terrorism) which contains strict internal rules for the prevention, detection and reporting of money laundering or suspicious business transactions which indicate possible money laundering and financing of terrorism.

EBNS has implemented its own customer identification system which ensures proper identification of the Bank clients. The more we know about our customer background or business activities, the better we can distinguish between unsuspecting and suspicious transactions and eliminate any potential money-laundering threat. Therefore, we can build the relationship with our customers based on absolute trust, confidence and transparency.

For the purpose of the identification of possible suspicious transactions and persons, EBNS uses systematic solution - application support which ensures the Bank continuous monitoring and identification of possible money laundering and financing of terrorism. Through the application support, the transaction data are integrated with the information on the users, which results in the complete overview of the activities within the system and enables precise and correct identification of suspicious activities.

In accordance with KYC principle as well as the implemented Law on the Prevention of Money Laundering and the Financing of Terrorism, EBNS must not enter into relationship with or perform any transaction required by the customer who rejects the identification process; i.e., if there is a lack of information on the purpose and nature of the transaction or if due diligence is not possible for other reasons.

EBNS also has established a policy covering relationships with politically exposed persons, which is complied with the best international AML practices.

Erste Bank a.d. Novi Sad does not establish any correspondent relationships with shell banks and does not permit its customers to execute transactions directly through their correspondent accounts or through correspondent sub-accounts.

EBNS provides regular training in the field of Anti-Money Laundering and Financing of Terrorism for the employees. This training includes the identification and reporting of transactions that must be reported to the competent regulatory authority- the Administration for the Prevention of Money Laundering, examples of different forms of money laundering which are in practice closely related to certain Bank products and services, as well as adequate explanation of internal policies for the prevention of money laundering.