

AML/CTF and Sanctions Compliance Policy Statement 2025

Nexent Bank N.V. including its branches, liaison offices and subsidiaries (hereinafter collectively 'Nexent Bank') is committed to contributing to international efforts to prevent financial-economic crime ('FEC') and to comply with applicable laws, regulations and standards particularly relating to anti-money laundering, counter-terrorist financing and sanctions compliance.

As part of this commitment, Nexent Bank has established a group-wide FEC prevention framework, encompassing – as a minimum – Anti-Money Laundering, Counter-Terrorist Financing (hereinafter collectively 'AML/CTF'), and Sanctions Compliance. This framework forms an integral part of the Bank's risk management approach, aiming to prevent its products and services from being misused for money laundering, terrorist financing, sanctions evasion, and related financial crimes.

At the group level, Nexent Bank has adopted FEC prevention policies that apply to all its offices (i.e. Head Office, branches, liaison offices, and subsidiaries) and employees. For example, the Bank has a group-wide AML/CTF Policy, and Sanctions and Restrictive Measures Policy. To ensure adherence to applicable sanctions regulations, Nexent Bank complies with:

- UN, EU and Dutch sanctions globally;
- US and UK sanctions globally where a US/UK nexus is present;
- Local sanctions laws and lists applicable in jurisdictions where the Bank operates.

Where local laws and regulations are more stringent, the local laws and regulations prevail.

Communication mechanisms are in place to keep relevant employees and management informed of regulatory developments and policy updates.

Framework Foundations and Regulatory Alignment

Nexent Bank's FEC prevention framework is built on a foundation of regulatory and industry standards, including but not limited to:

- EU directives and regulations related to the prevention of money laundering, terrorist financing, and violation of sanctions;
- the Dutch Anti-Money Laundering and Counter-Terrorist Financing Act (Wwft); and
- relevant industry and market standards, such as the FATF Recommendations and the Wolfsberg Principles.

Key Elements of the FEC Prevention Framework

Nexent Bank's FEC prevention framework includes the following key elements:

- Identification and assessment of money laundering, terrorist financing, and sanctions-related risks relevant to the Bank's activities and business environment.
- Customer due diligence procedures, including:
 - identify and verify the identity of customers, authorized signatories, and ultimate beneficial owners;
 - gain insight into the customer's ownership and control structure;
 - establish the purpose and nature of the customer relationship; and

- risk-based assessment of the money laundering, terrorist financing, and sanctions violations exposure.
- Enhanced due diligence (EDD) for politically exposed persons (PEPs) and other high-risk customers.
- Continuous customer and transaction screening against PEP lists and applicable sanctions regulations lists.
- Transaction monitoring procedures and systems to identify, assess and report unusual or suspicious activity.
- Regular customer reviews and event-driven reviews triggered by specific events, such as among others, changes in Nexent Bank's products/services used, changes in ownership and control structure, or PEP involvement.
- Retention of relevant documentation and records for at least five (5) years after ending the business relationship or completion of a transaction.
- Regular training sessions for relevant employees and management to raise awareness of AML/CTF and Sanctions Compliance risks and responsibilities, and maintain proper training records.
- Regular testing, review, and enhancement of key controls across all framework components to ensure effectiveness and compliance.

Countering Discrimination

Nexent Bank is committed to ensuring that all tasks undertaken, especially due diligence activities, are carried out in a manner that is free from bias or discrimination. These activities are performed strictly based on objective, risk-based criteria, in accordance with legal and regulatory requirements, and free from any consideration of race, ethnicity, gender, or any other protected characteristic. Nexent Bank strives to make compliance efforts fair, transparent, and consistent, while safeguarding the rights and dignity of all individuals, including customers.

To actively counter discrimination – either direct or indirect – while carrying out due diligence activities, Nexent Bank takes the following measures:

- regular training sessions for staff to enhance awareness and reduce bias in daily operations and decision-making; and
- regular evaluations of due diligence activities, which also assess the risk of potential discrimination.

Compliance Function

Group and local designated compliance officers are appointed to advise on FEC prevention, including AML/CTF, and Sanctions Compliance. They also monitor the fulfilment of all AML/CTF and Sanctions Compliance obligations by Nexent Bank.

For more information on Nexent Bank's FEC prevention framework, please visit the Compliance and Risk Management webpage of Nexent Bank and/or Nexent Bank's Documents section on Bankers Almanac.