GorenjskaBanka

INTERNAL

No.: 2-26/S-MM

January 15th, 2026

TO INTERESTED BANKS

Dear Sirs,

According to our business relationship, we would like to stress the main points of the Anti Money Laundering Policy in Gorenjska banka d.d., Kranj, as follows:

The sphere of Anti-Money Laundering and financing terrorism prevention (AML) in Gorenjska banka is regulated according to the EU and national legislation – Prevention of Money Laundering and Terrorist Financing Act and according to the Policies of AikGroup. The AML regulator is the national Office for Money Laundering Prevention of Slovenia, which is operating within the Ministry of Finance. The main regulator (entity of the supervision) represents the central bank (The Bank of Slovenia).

The role of Compliance & AML Department is advisory, supervisory and educational. The main focus is to provide instructions on implementing internal AML policies and procedures to the bank employees. The person responsible for AML Compliance Program is Authorized Representative & Head of Anti Money Laundering and Terrorism Financing. She is also AML Officer & Sanctions Officer and reports to the Board of Management.

Bank's AML written policy is a document, prepared for the internal use. It is based on the national AML law and on AikGroup Policies on AML, KYC/CDD, Customer's Acceptance Policy and Financial Sanctions Policy and Procedures - which have implemented the requirements of 4th and 5th EU AML Directive. Essential are interpretations of the law, stated by the national Office of AML Prevention – which are at your disposal on the web site - https://www.gov.si/drzavni-organi/organi-v-sestavi/urad-za-preprecevanje-pranja-denarja/. Furthermore our internal procedures are based upon the Guidelines of the main supervisor - The Bank of Slovenia.

It must be mentioned, that Gorenjska banka does not have international branches or subsidiaries abroad and the bank also does not maintain accounts for off-shore banks or shell banks.

According to the AML law, Gorenjska banka is required to apply the customer due diligence in the following cases:

- when opening the account for the customer,
- when establishing the business relationship with the customer,
- when carrying out a transaction, amounting EUR 15.000 or more,
- when there is a doubt about the veracity and adequacy of previously obtained customer or beneficial owner information,
- whenever there is a suspicion of money laundering or terrorist financing in respect of a transaction or customer.

Before establishing the business relationship or carrying out the transactions, the verification of the true identity of the customers must be performed on the basis of authentic, independent and objective sources. According to the law, all identifications must be made face-to-face, in the presence of the customer. The national law allows only few exceptions, when the identification can be performed non face-to-face.

Furthermore our bank obtains all the necessary data and information about the customer, such as data on the purpose and intended nature of the business relationship or transaction, as well as the data about the beneficial owner of the customer.

Gorenjska banka has established a Compliance Program, which includes AML policies and procedures, according to the national and international laws and standards. Our Know Your Customers Policy includes limitations on opening accounts for entities in certain industries or geographic regions.

When identifying natural persons, the official personal identification document is required. When identifying legal entities, the original or certified documentation from the court register or other public register is required, which is not older than 3 months. Negative media information of the customers is considered.

The customer and associated transaction risks are being minimized by following the bank's Compliance Program, which supports the indicators of the suspicious transactions. The bank checks all indicators of suspicious transactions. Those indicators include for example: strange activity of the customer, operating with the amounts which are just below the KYC limits, using multiple accounts, the business transactions, which are not consistent with the purpose or intended nature of the business relationship or with the customer's regular scope of business.

Gorenjska banka has prepared a risk analysis and established the risk assessment for all the customers, business relationships, transactions and products with the respect to their potential misuse for money laundering and terrorist financing. AML/CFT & Financial Sanctions Risk are properly mitigated.

According to the law, all Slovenian banks must daily report to the national Office of ML Prevention the data on each cash transactions exceeding EUR 15.000, data on each fund's transfer exceeding EUR 15.000 to high-risk countries, as well as data on all suspicious transactions, related to money laundering and terrorism financing, irrespective of the amount.

According to the Guidelines of the Bank of Slovenia, Bank Association of Slovenia, Office of the ML Prevention and Act Regulating Restrictive Measures Introduced or Implemented by the Republic of Slovenia in Accordance with Legal Acts and Decisions Adopted by International Organisations, Gorenjska banka screens client's portfolio and transactions against the lists of entities that are under the restrictive measures of EU, SC UN or are listed on OFAC SDN and UK HMT sanction list. The bank is obliged to identify and perform enhanced due diligence of politically exposed persons and other higher and high-risk clients. Gorenjska banka does not cooperate with shell banks and subjects under sanctions regimes.

E-training program for all employees is performed at least once a year, as well on-site trainings for target employees. In case of legislative changes the training program becomes much more intensive. The person responsible for Compliance Program and her deputy are conducting the training program according to the bank's annual training program. E-learning is also essential part. Training program occasionally includes training programs with the Bank Association of Slovenia, which are performed by the representatives of the national Office of the ML Prevention and Bank of Slovenia.

Yours faithfully,

GorenjskaBanka

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Mirjam Mediževec,

Authorized Representative & Head of AML/TF