

Statement regarding Anti-Money Laundering, Counter Terrorist Financing and **Know-Your-Customer measures within Saxo Bank Group**

Anti-Money Laundering (AML), Counter Terrorist Financing (CTF) and Know-Your-Customer (KYC) measures are focus areas within Saxo Bank Group. Below you will find a summary of our policy in regard to these areas.

The Board of Directors has adopted a Policy and Charter on prevention of money laundering and terrorist financing. It requires Saxo Bank's head office, branches and subsidiaries worldwide to have effective programs in place to comply with applicable laws, regulations and ethical standards;

The Head of Group Compliance & AML, together with a dedicated team, oversees these policies, practices and procedures. Furthermore, AML Officers within the different business units are obliged to report to the Group Anti-Money Laundering Officer as well as to national Financial Intelligence Units (FIU);

We have implemented procedures and routines regarding Know-Your-Customer and Customer Due Diligence, e.g. identifying customers and beneficial owners and verifying their identity on the basis of documents, data or information obtained from reliable and independent sources. Furthermore, Saxo Bank pays special attention to:

- Understanding the ownership and control structure of our customers,
- Obtaining information on the purpose and intended nature of the business relationship, and
- Monitoring the business relationship.

We have established processes enabling us to identify persons and legal entities identified by government agencies to be involved in terrorist financing, money laundering, etc. (e.g. EU's, HMT's and OFAC's sanction lists);

We have established processes enabling us to identify persons who qualify to be a PEP or related to a PEP.

We have developed procedures that assist in the monitoring of transactions for the purpose of identifying possible suspicious activity;

We have established employee training programs to educate and assist employees in the ways of preventing that Saxo Bank is used to execute transactions related to money laundering and terrorist financing;

Saxo Bank does not allow anonymous accounts.

We co-operate with law enforcement and regulatory agencies in accordance with national regulation.

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