

Group Sanctions Policy

1. PURPOSE AND SCOPE OF POLICY

This Policy states the Bank of Cyprus’s commitment to act in full compliance with, sanctions or restrictive measures imposed on countries, territories, entities, or specific persons and bodies by the UN and the EU, by the governments of the countries that the Bank operates in, as well as by the US Department of Treasury’s Office of Foreign Assets Control (“OFAC”) and by HM Treasury’s Office for Financial Sanctions Implementation.

It also covers important restrictive measures imposed by other US authorities such as the Department of Commerce, where a US nexus is established.

Compliance with sanctions, or restrictive measures, is important for:

1. The avoidance of criminal, civil or regulatory action and/or penalties that may be taken against the Bank by regulatory or other authorities,
2. The protection of the Bank’s reputation, and
3. Cypriot national security and rule of law; the safety and security of other EU Members and countries around the world; the effort to combat terrorist financing and proliferation; and respect for civil society and human rights.

Additionally, the Bank of Cyprus ensures the following:

1. The Sanctions Policy outlines the legal and regulatory requirements/principles emanated from the provisions set out in (a) the Law for the Implementation of the Provisions of the United Nations Security Council Resolutions (Sanctions) and the Decisions and Regulations of the Council of the European Union Law 58(I) of 2016, and (b) the Central Bank of Cyprus Directive for Compliance with the Provisions of United Nations Security Council Resolutions and the Decisions/Regulations of the Council of the European Union.
2. The Bank and its subsidiaries meet the requirements set out in the Group Sanctions Policy and therefore the requirements of the Sanctions and Terrorism Laws.
3. The Bank, through the Annual Sanctions Risk Assessment Exercise, identifies sanctions risks and sets out appropriate mitigation measures.

Financial institutions play an important role and are held to high standards. We expect all employees to view this policy as a Bank priority and to apply it conscientiously.

2. ABBREVIATIONS

Within this document, the following abbreviations are used:

Abbreviation	Definition
AML/CTF	Anti-money Laundering / Combating Terrorism Financing
AMLCO	Anti-Money Laundering Compliance Officer
CBC	Central Bank of Cyprus
EU	European Union

HM	His Majesty
ICAAP	Internal Capital Adequacy Assessment Process
OFAC	Office of Foreign Assets Control
UK	United Kingdom
UN	United Nations
US	United States

3. DEFINITION OF TERMS

1. **Group**

The Bank of Cyprus and its subsidiary companies.

2. **Group Entity**

Any company of Bank of Cyprus.

3. **High Risk Customer**

Customer that may pose a particular risk to the reputation of the Bank and who should normally be treated as high risk and be subject to enhanced due diligence measures (see Customer Acceptance Policy).

4. **HM Treasury’s Office for Financial Sanctions Implementation**

Provides a consolidated list of persons and organisations under financial sanctions, including those under the Sanctions Act and other UK legislation.

5. **Office of Financial Sanctions Implementation (OFSI) – UK**

The UK government publishes the UK Sanctions List, which provides details of those designated under regulations made under the Sanctions Act. The list also details which sanctions measures apply to these persons or ships, and in the case of UK designations, provides a statement of reasons for the designation.

6. **Office of Foreign Assets Control (OFAC)**

Office in the US Department of Treasury that administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States.

7. **Persons connected with a sanctioned country.**

Persons connected with a sanctioned country are considered those who fall within the definition of:

- a. Persons who are residents in a sanctioned country, and
- b. Persons with a passport from a sanctioned country

8. **Sanctions**

Instruments of a diplomatic or economic nature which seek to bring about a change in activities or policies such as violations of international law or human rights, or policies that do not respect the rule of law or democratic principles. Sanctions (or restrictive measures) may target governments, non-state entities and/or individuals (such as terrorist groups and terrorists). They may include arms embargoes, other specific or general trade restrictions (e.g. import and export bans), financial restrictions, restrictions on admissions (e.g. visa and travel bans), or other measures, as appropriate.

9. **Secondary Sanctions**

The United States imposes sanctions measures which authorize penalties against non-U.S. banks for specified activities even where there is no U.S. jurisdiction. These are referred to as “Secondary Sanctions.” The penalties must be affirmatively imposed by U.S. policy makers and are not automatic. However, the penalties

are serious and include sanctions designations against the non-U.S. banks, prohibiting correspondent and other accounts with U.S. banks, and various other measures which would be of significant concern to Bank of Cyprus. Group Entities must not engage in any business relationships or transactions relating to parties subject to U.S. Secondary Sanctions or activity which can expose the Bank or any of its Entities to U.S. Secondary Sanctions. The Compliance Division will provide periodic updates on U.S. Secondary Sanctions, where deemed necessary.

10. Specially Designated Nationals (SDN)

The United States blocks assets and imposes restrictions on dealings with specified individuals, companies and entities. These can be individuals, companies, or entities owned or controlled by, or acting on behalf of a sanctioned country. They can also be individuals, groups, or entities, such as terrorists and narcotics traffickers, designated under OFAC programs that are not country specific. OFAC maintains a list of these Specially Designated Nationals.

11. Subject to Financial Sanctions (EU)

The European Union maintains asset freezes and bans on investment for parties subject to sanctions. These can include individuals, companies, or entities owned or controlled by, or acting on behalf of a sanctioned country. They can also be individuals, groups, or entities, such as terrorists and narcotics traffickers, designated under EU measures in force that are not country specific. The European Union’s External Action Service maintains a list of parties subject to EU financial sanctions.

12. U.S. Jurisdiction

U.S. sanctions rules apply to U.S. persons anywhere located and U.S. or foreign persons acting in the United States. U.S. persons would include foreign branches of U.S. banks and other U.S.-incorporated entities, as well as U.S. personnel even if working abroad at a non-U.S. company. Sanctions administered by OFAC also apply to property subject to U.S. jurisdiction, which includes property in the possession of a U.S. person, physically in the United States or in some cases where subject to U.S. export controls.

4. ENTITIES AFFECTED

The Policy applies to all Group Entities and they must, as a minimum, meet the requirements set out in this Policy.

All Bank subsidiaries are expected to enact in their own internal systems equivalent procedures regarding Sanction programs. The corresponding Bank function has the responsibility for coordinating the application of the framework across the Bank, in accordance with established reporting lines.

5. GENERAL PRINCIPLES

5.1 General Principles

1. Complete abstinence from business relationships or transactions which violate or facilitate the violation of sanctions as defined in this Group Policy.
2. Adherence to directives and guidance from regulatory and other authorities relevant to sanctions.
3. Availability of information and provision of appropriate training by Group Entities’ Compliance Departments to Group Entities employees to ensure that they understand the provisions of this policy, the importance of complying with it and the implications of a failure to do so.

4. Implementation of appropriate filtering software systems that enable the screening of customers and transactions against UN, EU, US and UK sanctions lists. Furthermore, the use of public information from reputable providers, e.g. World-Check, is required.

5.2 Implementation Procedures

All Group Entities must, as a minimum, meet the requirements of this Policy. In any country where the requirements of applicable law(s), directives or practices establish a higher standard, Group Entities must meet those standards.

All procedures relating to the treatment of sanctions (screening, accepting, reporting etc.) should be described in the relevant local operations manuals and in Organizational Circular 151.

Furthermore, all Compliance Departments are responsible for ensuring that information on applicable sanctions and procedures is posted on their Employees' Portal and that this is updated regularly.

5.3 Implementation Guidance Notes

Sanctions can be:

1. Specific, i.e. relate to specific lists of named individuals, legal entities, organizations, vessels etc. (the US Department of Treasury refers to some of these entities as Specially Designated Nationals),
2. General, i.e. cover all transactions with certain countries or jurisdictions; certain transactions with countries or jurisdictions such as exports, imports or new investment, or all transactions within a certain area of activity/products (e.g. arms sales to a particular country).
3. Sectoral, i.e. cover certain parties in specific sectors (OFAC designates parties on a Sectoral Sanctions Identification List or "SSI List") but only restrict certain transactions of these designated parties.
4. Focused prohibitions on the export of commercial and dual-use goods, software and technology subject to U.S. jurisdiction under the Export Administration Regulations ("EAR")

The treatment of customers / transactions falling in the above categories is described in Appendix 5 and the Organizational Circular 151 and the relevant operations manuals of the subsidiaries.

5.4 Training

Group Entities should provide appropriate training to employees to ensure that they understand the provisions of this policy, the importance of complying with it and the implications of a failure to do so. Identified employees with positions of greater exposure or responsibility relating to the implementation of this Policy should receive enhanced training as appropriate. All training should be refreshed frequently as may be deemed appropriate. Compliance Departments in cooperation with Human Resources Departments will be responsible for arranging for and maintaining records of employee training.

5.5 Reporting of Violations

Senior Management and the Compliance Department of the Group Entity must be advised immediately of any potential violations relating to sanctions. Where deemed necessary the Group Entity's Compliance Department must inform immediately the Chief Compliance Officer and the Bank's AMLCO.

Reporting should be encouraged via written policies/procedures maintained by each Group Entity. No employee should be punished for reporting a perceived violation or concern, and no person in a position of authority should otherwise discourage reporting. Further, each Group Entity should ensure that reporting is treated as a positive event in performance reviews.

The Compliance Division, upon receiving a report, will conduct an appropriate internal review and record its findings, as per the set procedures. The Chief Compliance Officer may instruct the responsible business unit to freeze funds or an account pending the outcome of the review. Where the Compliance Division finds indications of a violation of sanctions or other laws, in addition to violation of the Policy, it will coordinate with the Legal Department and Senior Management to determine an appropriate response.

Where appropriate, the Compliance Division, in coordination with the AMLCO and legal counsel, may report potential violations of U.S. sanctions rules by the Group or its Entities to OFAC as part of a “voluntary disclosure”. In certain cases, the Compliance Division may choose to report activity related to parties where secondary sanctions apply, but there is no U.S. jurisdiction.

5.6 Review of Policy and its Implementation

Periodic review, at least annually, and ongoing improvement is a key part of the Policy. The results of reviews will be shared with Group Entities and Compliance Division will be responsible to implement recommendations and draw lessons learned to improve compliance implementation.

5.7 Sanctions Compliance Officer

Both the Bank and each Group Entity will designate Sanctions Compliance Officers. This will usually be the same employee as AMLCO.

5.8 Capital Adequacy of the Bank

Capital requirements emanating from sanctions risks are calculated under the ICAAP exercise within the context of the calculation of Pillar II capital set aside for operational losses. In this respect, scenarios are drafted relating to either Money Laundering, Terrorist Financing or Sanctions Risk and historical data as well as existing mitigating measures are considered to calculate the expected loss in case the scenario crystalizes. Operational losses could be in the form of penalties, loss of business, legal/operational expenses or any other costs relevant to each scenario.

The provisions set out in this policy should be considered when selecting and drafting scenarios for the purposes of calculating capital requirements emanating from ML/TF risks.

In case operational losses are expected to influence cash flows, their impact on the liquidity stress tests and on the different liquidity matrices will be evaluated by Risk Strategy.

6. GOVERNANCE

The Roles and Responsibilities within the Bank of Cyprus are as follows:

Role	Final
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Board of Directors	Bears the ultimate responsibility for the effective implementation of this Policy and for setting the right tone from the top.
Audit Committee	<ul style="list-style-type: none"> • Approves the Policy • Makes sure that sufficient, dependable, and secure internal procedures are in place to ensure that the Group complies with the policy. • Monitors the effective implementation of the Policy via the Control Functions.
ExCo	<ul style="list-style-type: none"> • Reviews the Policy prior to submission to the AC. • Ensures that it is effectively embedded throughout the Group’s operations.
Chief Executive Officer	Provides approval for the exemptions to the policy
Deputy Chief Executive Officer	Provides approval for the exemptions to the policy
Compliance Division	<ul style="list-style-type: none"> • Overall responsibility for the drafting and enforcing the policy. • Prepares and updates relevant procedures/circulars as required. • Organizes and conducts relevant training for all staff. • Carries out monitoring reviews to assess the effective implementation of the Policy and recommends corrective action where required.
Risk Management Division	Reviews and assesses the compliance risks addressed in the policy, ensuring that the risks undertaken are within the Bank’s risk appetite.
Internal Audit Division	<ul style="list-style-type: none"> • Periodically assesses the Policy and the Bank’s system of internal controls, corporate governance and risk management processes related to the Policy. • Inform AC of its findings and relevant recommendations.

7. EXCEPTION APPROVAL PROCESS

In cases where there is a request for deviation from this policy, which:

1. is fully justified.
2. does not violate the legal/regulatory framework, or constitutes a significant moral lapse, nor does it constitute a significant reputational risk for the Bank and
3. has the approval of the Chief Compliance Officer

then this exception can be allowed with the agreement of the CEO or Deputy CEO of the Bank. The Audit Committee to be notified accordingly.

8. IMPLEMENTATION PROCEDURES (KEY PROCESSES)

1. The Group must have in place written, well documented and detailed procedures for the implementation and monitoring of this policy and the policy shall effectively be communicated to all relevant staff to mitigate any resulting compliance risks. The procedure also acts as an internal alert and:
 - a. Provides guidance as to the necessary information to help examine/assess a case.
 - b. Ensures that the potential or actual breaches raised are assessed and escalated in a timely manner.

- c. Ensures the tracking of the outcome and monitoring of mitigation actions.
 - d. Ensures appropriate record keeping.
2. Systems and processes must be adjusted accordingly, and staff must be adequately trained to support effective implementation and monitoring processes of the policy.

APPENDIX 1-A - List of countries which are subject to General Sanctions on specific products / services, or Sectoral Sanctions on specific industries and specific types of transactions by OFAC, UK ,EU, and UN

Treatment of sanctioned entities or transactions subject to sanctions relating to the following countries must be in accordance with specific instructions issued by the relevant Regulation. Countries with List-Based Sanctions Programs:

1. Iraq
2. Libya
3. Somalia
4. Venezuela

Note:

Refer to OC151 and the relevant operations manuals of the subsidiaries for the treatment of transactions to / from countries included in Appendix 1-A. In general, these vary according to the country and sanctions imposed, and Managerial approval is required for the performance of transactions.

APPENDIX 1-B - List of countries which are subject to Sanctions / Restrictions related to actions destabilizing the situation in Ukraine

Countries

1. Belarus
2. Russia

Note:

Due to the extent and complexity of the imposed sanctions / restrictions please refer to General Circular (GC 2022-003) and the Customer Acceptance Policy, which describe the treatment of customers and transactions for clients with a Russian or Belarusian nexus.

APPENDIX 2- Current list of countries which are subject to strict sanctions (on an extended list of products / services and on the government) by OFAC, UK, EU and UN

Current list of countries which are subject to strict sanctions (on an extended list of products / services and on the government) by OFAC, UK, EU and UN. For Sudan, even though sanctions were lifted, remains on this list due to restrictions imposed by Correspondent Banks.

Countries

1. Cuba
2. Syria
3. Sudan (* North, not including South Sudan)

Note:

Refer to OC 151 and the relevant operations manuals of the subsidiaries for the treatment of customers connected with countries included in Appendix 2 as well as transactions to / from these countries. In general, new customers residing in these countries are not accepted, whilst existing customers are categorized as high risk, and are subject to prohibitions relating to the use of USD and Managerial approval is required for the performance of transactions.

APPENDIX 3 - Current list of countries which are subject to stricter sanctions (on a comprehensive list of products / services and on the government) by OFAC, UK, UN and EU.

Current list of countries which are subject to stricter sanctions (on a comprehensive list of products / services and on the government) by OFAC, UK, UN and EU.

Countries:

1. Iran
2. Democratic People's Republic of Korea (North Korea)

Territories:

1. Crimea / Sevastopol
2. Donetsk / Luhansk*
3. Kherson*
4. Zaporizhzhia*

Note:

Refer to OC 151 and the relevant operations manuals of the subsidiaries for the treatment of customers connected with countries included in Appendix 3 as well as transactions to / from these countries.

New customers connected to these countries are not accepted. There is an exception which allows the onboarding of individuals with an Iranian passport who reside in countries under Category F of the Customer Acceptance Policy. These customers are classified as High Risk.

Existing customers resident in these countries (Iran) are categorized as High Risk until the termination of the business relationship is possible.

Clients connected to these countries are subject to transaction prohibitions, and in particular, prohibition in the use of USD, and general prohibition on outgoing wire transfers in any currency. Managerial approval is required for the performance of transactions.

No transactions relating in any way to these countries/areas are performed*.

**Transactions relating to the payroll of civil maritime personnel residing in Donetsk / Luhansk/ Kherson/ Zaporizhzhia are allowed, provided that their services are performed outside the Covered Regions and such services are not performed on behalf of any entity located in, or organized under the laws of, the Regions (OFAC General License 24).*

APPENDIX 4 - Implementation Guidance Notes

Specific Sanctions

With respect to sanctions against specific lists of named individuals, legal entities, organizations, or vessels issued by the EU, UN, US or UK:

New Business Relationships / Maintenance of existing Business Relationships:

1. New business relationships with parties subject to specific EU, UN, US or UK sanctions are prohibited.
2. For parties that were previously subject to specific sanctions, a new business relationship is not allowed within one year after the lifting of the sanctions. A new business relationship can be considered one year after the lifting of sanctions, provided that the client is categorized as high risk and the AMLCO provides her consent.
3. The opening or the maintenance of accounts related to close family members, close associates or related entities ((irrespective of %age of ownership (directly or indirectly)) of parties subject to specific EU, UN, US or UK sanctions, is strictly prohibited.
4. Note: The Bank could consider maintaining the relationship with a legal entity related to a party subject to specific sanctions, only if the legal entity is listed on a stock exchange in an EU country, UK or US and provided that the ownership held by the sanctioned party (including related parties) is under 50%.

Execution of transactions with counterparties:

1. The execution of transactions with counterparties subject to specific EU, UN, US or UK sanctions and related entities with ownership (directly or indirectly) equal or over 50%, is strictly prohibited. In the cases where a general license exists, the execution of transactions may be allowed, provided that the transactions are thoroughly scrutinized and the AMLCO provides her consent.
2. The execution of transactions with counterparties which are related entities with ownership (directly or indirectly) under 50% by the party subject to specific EU, UN, US or UK sanctions, can be considered, provided that all necessary supporting documents are obtained, examined and found satisfactory and the AMLCO provides her consent.

Existing business relationships which subsequently are subject to specific sanctions:

Existing business relationships which subsequently are subject to specific sanctions (or whose accounts are beneficially owned/controlled by persons subject to specific sanctions) should be treated as follows:

1. The Sanctions Policy requires freezing of accounts pending review to determine if an asset freeze is required or a violation of law has occurred.
2. Cyprus, the EU, the UN and the UK refer to “freezing” of accounts and property, while the US government and OFAC refer to “blocking” of accounts and property.
3. In both cases this involves freezing accounts so that the customer cannot (a) access, remove, internally transfer or externally wire funds from the account; (b) alter the investments or currencies held in an account, or (c) access and/or remove physical property from any deposit box or other arrangement.
4. The account may generate interest or investment return in the normal course, but the interest may not be paid out and must remain in the account. Additionally, no bank charges shall be debited in the accounts. Any new funds or property coming into account must be received and also frozen and reported to the local authorities.

5. Group Entities may be required to report frozen accounts and make periodic reports to responsible authorities.
6. Group Entities must freeze accounts of parties subject to specific sanctions (or whose accounts are beneficially owned/controlled by persons subject to specific sanctions) as follows:
 - a. All Group Entities must freeze accounts of parties subject to Cyprus, EU, or UN Sanctions
 - b. Each Group Entity must freeze accounts where required under the law of the jurisdiction where they operate.

Parties who become subject to US or UK specific sanctions but not Cyprus /EU/UN sanctions:

For parties who become subject to US or UK specific sanctions but not Cyprus (or any other country the Group operates in), UN or EU sanctions, their accounts must be initially frozen. Thereafter, the Bank will assess the account and take one of the following actions:

1. If the funds in the account are subject to US or UK jurisdiction in any manner, the account will need to be blocked / frozen respectively. The fact that an account is denominated in US dollars / Stg is not in and of itself a cause for US /UK jurisdiction, although transfers between banks in dollars / Stg generally clear through the United States / UK correspondent Banks respectively.
2. If the party sanctioned under US law is subject to a designation carrying US Secondary Sanctions (see description in Appendix 4), but the account is not subject to US jurisdiction and not denominated in US dollars, specific guidance should be sought from the Compliance Division.
3. If beyond reasonable doubt, (i) the party sanctioned under US law is not subject to a designation carrying US Secondary Sanctions, (ii) it is determined that there is no US / UK jurisdiction, and (iii) the account is not denominated in US dollars / Stg, then the account could be exceptionally closed, taking into account the risk involved in each case, provided that the responsible Unit obtains relevant instructions from the AMLCO, subject to the following:
 - a. It is imperative to create records confirming that the closing is to help the bank maintain legal compliance, avoid legal risk and act consistent with internal policy.
 - b. Arrange to transfer the account balance to an account at another financial institution indicated by the customer, to be remitted in a currency other than US dollars / Stg.
4. In all cases, the affected entities must be flagged as High-Risk Customers for easy identification and flagged accordingly for better monitoring.

Unfreezing (unblocking) of Accounts/Assets

Frozen accounts may be unfrozen only by (a) authorization from the jurisdiction which required the freezing/blocking, or (b) an official removal of the specific sanctions leading to the asset freeze or blocking.

Sectoral Sanctions

1. It is prohibited to establish or continue business relationship with a person/entity subject to sectoral sanctions or with an associated person/entity (to a percentage, direct or indirect, equal to or more than 50%).
2. Transactions with counterparties subject to sectoral sanctions are allowed only if such transactions involve administration expenses, including salaries up to Euro7.000,00 per month per individual. Such transactions must be thoroughly examined and supported by sufficient supporting documents/information prior to carrying out transactions to ensure that there is no violation of sectoral sanctions.

Focused prohibitions on the export of commercial and dual-use goods, software and technology subject to U.S. jurisdiction under the Export Administration Regulations (“EAR”).

1. It is prohibited to establish or continue a business relationship with parties included on The Bureau of Industry and Security List (BIS List) ~~these lists~~.
2. A business relationship with affiliated entities to the ones listed may be established or maintained. Such business relationships must be categorized as High Risk and monitored. In such cases, commercial transactions may be carried out, subject to enhanced due diligence.
3. Client transactions with counterparties that are included on these lists are permitted, subject to enhanced due diligence.

Dual Use Goods

1. It is prohibited to carry out transactions involving dual use goods related to all countries / regions listed in Appendix 1-A, Appendices 1-B, Appendix 2.
2. In addition, it is prohibited to carry out transactions concerning the export of dual use products in relation to all High-Risk countries for sanction evasion as defined in GE 2022/003.