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Information regarding the K&H Bank's embargo policy

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International organizations and authorities such as the United Nations, the European Union (and its member states) and other (local) authorities can impose restrictive measures against countries, organizations, legal entities and individuals for committing, or being suspected of, human rights and international law infringements, acts of crime, terrorism, money-laundering etc. These measures are most commonly referred to as sanctions or embargoes.

K&H Bank has a responsibility towards customers and authorities to conduct business in a lawful and ethical way. Therefore, we will observe all binding requirements of applicable laws and regulations. For reasons of social responsibility or other considerations, we may also choose to be more strict than legally required.

This document is based on the information available at the time of writing (November 2024). Given the volatile and exceptional nature of the situation, especially with regards to Russia, the legal context and K&H Bank's policy may change at any moment. This document will be updated with additional information when needed.

[I. EMBARGOES](#)

An embargo is a restrictive measure or sanction on national and/or international level. Although provisions differ by country, person or issuing authority, we distinguish two broad types of embargoes:

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- Financial embargoes: restrictions related to financial operations and financial resources.
- Trade embargoes: restrictions on the import or export of certain goods or trade with certain countries or parties

K&H Bank complies with financial and trade embargoes issued by the United Nations, the European Union and any other embargo issued by a number of third countries that it determines to be relevant, such as the USA (OFAC), the UK (OFSI), etc.

For more information on UN, EU, OFSI and OFAC sanctions, please click on the respective links below.

Observing embargo regulations means that K&H Bank will not provide funds or economic resources to persons, entities or government agencies that appear on embargo sanction lists, nor support any kind of transaction with these parties. Any transaction with a sanctioned individual or entity, or otherwise in breach of sanction regulations or K&H Bank's own policy, is prohibited and will not be processed.¹ This not only helps us to avoid penalties for breaching international sanctions, but it also helps you, as our customer, to manage some of the risks associated with international trade.

Sometimes companies or entities are not explicitly sanctioned, but they may be owned or controlled by individuals or entities subject to an asset freeze, making it prohibited to continue to do business with them. In this context, K&H Bank asks its customers to perform their own due diligence in order to make sure they are not dealing with sanctioned parties.

K&H Bank has implemented certain screening measures in its different processes to ensure compliance with the applicable embargoes and with its own policy where this is stricter. As a result, a customer may be requested to provide K&H Bank with more information or documentation on transactions or counterparties before K&H Bank can process a transaction or payment. In some cases, K&H Bank may require a signed Declaration of Compliance by the client.

Please note that Correspondent Banks also have the right to suspend any transaction in case their monitoring system detects a potential breach of embargoes or transactions requiring future information or documentation. In case of suspended transactions, K&H Bank acts only as intermediary between the customer and the correspondent bank, without having any influence on the result of the investigation of the correspondent bank.

In order to avoid complications, customers are advised to contact the bank when considering doing business with countries, persons, entities or government agencies subject to embargoes. For more information on applicable embargoes or on specific K&H Bank policies, please get in touch with your K&H Bank contact person or relationship manager.

II. K&H BANK SPECIFIC COUNTRY POLICIES

Due to the complexity or scope of certain sanction programs, K&H Bank sometimes has to apply a more rigorous policy with respect to, *inter alia*, the following countries (and regions): Afghanistan, Belarus, certain Russian-occupied regions of Ukraine, Cuba, Iran, North-Korea, Russia, Syria, Venezuela, etc.

¹ In case of a blocking or freezing of funds by K&H Bank, customers should contact the local competent authority and request an official authorization for their release (for Hungary this is the National Tax and Customs Administration / Hungarian Financial Intelligence Unit, fiu@nav.gov.hu).

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K&H Bank deems these (and other) countries to be more sensitive, for instance because of comprehensive or complex embargoes or export control regulations, imposed under UN, EU or Third Country legislation or regulations, and/or because of the presence of a significant number of blocked individuals or entities. Therefore, please always contact your relationship manager at K&H Bank, when you have questions regarding our policy with respect to one of these countries.

Through a thorough screening of the transaction details, K&H Bank wants to make sure that the transaction is legally allowed and within the limits of K&H Bank's own policy.

The details for each country policy may change at any given time, due to changing regulations or (geo)political or economic circumstances.

AFGHANISTAN

Following the Taliban takeover of the country and the Afghan state apparatus in particular, K&H Bank has decided that it will no longer process any payment or transaction that is relates to Afghanistan.

BELARUS

The sanctions wrt. Belarus are not only very diverse and comprehensive, EU and Third Country sanctions are very different, cover a different range of activities, businesses and trades, persons and entities and are very volatile due to the (ongoing) issuance of new sanctions. As of 1 August 2023, K&H Bank will no longer process any outgoing payments or transactions to Belarus, irrespective of the currency. This means a.o. that K&H Bank will reject every outgoing payment destined for an account at a Belarussian bank but will still process incoming payments for its current own Group customers coming from an account at a Belarussian bank. Due to the enhanced due diligence required for transactions involving Belarus, it is possible that the processing of these transactions is delayed significantly.

In addition to the above restrictions, K&H Bank will not process any transaction, including incoming payments, involving a sanctioned counterparty or otherwise in breach of embargoes.

In this context, K&H Bank would like to point out that several (Belarussian) banks are currently subject to an asset freeze imposed by the EU, US or UK.

Be advised that some entities or banks were not explicitly sanctioned but may be owned or controlled by individuals or entities subject to an asset freeze, making it prohibited to continue doing business with such banks.

Be advised that a number of banks have been disconnected from the SWIFT network from March 20th, 2022, onwards and K&H Bank is not able to process transactions to or from these banks. Please refer to the [SWIFT website](#) for more information.

CUBA

K&H Bank will not process any transactions in USD, CAD or GBP transactions that involve Cuba and Cuban parties.



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K&H Bank will only process non-USD and non-CAD payments for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of K&H Bank's own policy (please refer to your K&H Bank contact person for more details).

In addition, customers that are resident in, established in (or moving to) Cuba can be subject to additional restrictions.

IRAN

In light of certain international and local developments with respect to Iran, K&H BANK maintains a strict policy.

K&H Bank will only process trade related payments and transactions with regard to the export to Iran and only for its own customers, who are active as producers of medicines and / or medical supplies, excluding medical machinery (equipment), as far as the following cumulative conditions are met:

- The customer is a longstanding K&H Bank customer with a diversified product portfolio; and
- It does not concern (direct, nor indirect) payments or transactions in USD, in CAD or in GBP; and
- The transactions are documented in detail; and
- After thorough screening of the transaction details, including all involved parties, it is clear that the transactions are transparent, legally allowed and within the limits of K&H Bank's own internal policy with regard to Iran.

For more details, please contact your K&H Bank contact person.

In addition, customers that are resident in, established in (or moving to) Iran can be subject to additional restrictions.

MYANMAR/BURMA

Besides financial transactions to and from sanctioned persons and entities, certain transactions and related financial transactions are excluded, regardless of the currency, including, but not limited to, transactions related to: the export of arms and related military goods, dual-use items, and goods and equipment, technology and software included in the trade embargo list and mainly used for monitoring and interception of incoming and outgoing internet and phone communications.

Further information on export restrictions with respect to dual-use goods can be found in Section III below.

Therefore, a financial transaction regarding Myanmar/Burma will only be processed after thorough screening of the transaction details, to make sure that the transaction is transparent, legally allowed and also within the boundaries of K&H Bank's internal policy regarding Myanmar/Burma.

NORTH-KOREA

K&H Bank will not process any payment or transaction that is related to North-Korea.

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**RUSSIA**

Given the scope of the embargoes imposed against Russia and the vulnerability of the local financial market, K&H Bank has decided to limit its services related to transactions to and from Russia and to discontinue transactions in Russian Rubels. K&H Bank will under no circumstances be liable for the failed execution or non- execution of these transactions as a result of its embargo policy, government measures, market conditions or the failure of our correspondent banks to execute the transactions or execute them correctly or timely.

• Transactions to and from Russia (irrespective of the currency)

K&H Bank does not process any outgoing payments or transactions to Russia, irrespective of the currency. This means that K&H Bank will reject an outgoing payment destined for an account at a Russian bank, but still processes incoming payments for its current own Group customers coming from an account at a Russian bank. Due to the enhanced due diligence required for transactions involving Russia, it is possible that the processing of these payments is delayed significantly.

• Accounts and transactions in Russian Rubles

Group has decided to no longer offer accounts in Russian Rubles. Additionally, K&H BANK will no longer processes outgoing or incoming transactions in Russian Rubles.

• Transactions involving sanctioned parties or otherwise in breach of the embargoes

In addition to the above restrictions, K&H Bank will not process any transaction, including incoming payments, involving a sanctioned counterparty or otherwise in breach of embargoes.

In this context, K&H Bank would like to point out that several (Russian) banks are subject to an asset freeze imposed by the EU, US or UK.

Also be advised that some entities or banks were not explicitly sanctioned but may be owned or controlled by individuals or entities subject to an asset freeze, making it prohibited to continue to do business with them.

Moreover, a number of banks were disconnected from the SWIFT network and K&H Bank will not be able to process transactions to or from these banks. Please refer to the [SWIFT website](#) for more information.

Finally, customers that have Russian nationality can be subject to additional restrictions.

• Trade restrictions with respect to Russia

Russia is subject to a wide range of import and export restrictions, applicable to every importer or exporter.

Import Restrictions

K&H Bank will not process any transaction and related financial transaction linked to the import of goods listed in the Annexes to EU Regulation 833/2014 if they originate in Russia or are exported from Russia.

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These import restrictions apply to, *inter alia*, crude oil or petroleum products, coal and other products, like iron and steel products, gold, goods which generate significant revenues for Russia, etc.

These rules also apply to the purchase or transfer of such restricted goods.

Export Restrictions

For more information on dual-use export restrictions, please see Section III below.

In addition, K&H Bank will not process any transaction or related financial transaction that falls within the scope of other EU export restrictions imposed against Russia, including (but not limited to) restrictions regarding the export of 'Advanced Technology' items that could enhance Russia's military and technological capacity, goods and technology suited for use in aviation or the space industry as well as in the military sector, the energy sector, luxury goods, maritime navigation goods and technology, and goods which could contribute to the enhancement of Russian industrial and military capacities.

Finally, K&H Bank also does not process transactions or related financial transactions linked to the provision of a wide range of services to the Russian government or entities established in Russia, including, *inter alia*, accounting, auditing, consulting, bookkeeping, legal advisory or tax consulting services, etc.

In order to implement these trade restrictions, K&H Bank applies an enhanced due diligence for transactions involving Russia. The necessary documentation (invoices, bill of lading, etc.) will be requested, and as a result, it is possible that the processing of related payments is significantly delayed.

Russian-occupied regions of Ukraine and impact on Ukraine as a country

All transactions to or from the regions of Crimea and Sevastopol, Donetsk, Luhansk, Kherson and Zaporizhzhia are prohibited and will not be processed.

Apart from these regions, K&H Bank will continue to process transactions (both open account payments and trade finance transactions) to and from Ukraine for its own Group customers.

Any transaction with a sanctioned individual or entity, or otherwise in breach of embargoes or K&H Bank's own policy, is prohibited and will not be processed.

In addition, customers that are resident in, established in (or moving to) Crimea (and Sevastopol), Donetsk or Luhansk can be subject to additional restrictions.

SYRIA

K&H Bank will not process any transactions in USD, CAD or GBP that involve Syria or Syrian parties.

K&H Bank will only process non-USD, non-CAD or non-GBP transactions for its own customers, after thorough screening of the transaction details to make sure the transaction is legally allowed and within the limits of K&H BANK's own policy (please refer to your K&H Bank contact person for more details).

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In addition, customers that are resident in, established in (or moving to) Syria can be subject to additional restrictions.

VENEZUELA

Sanctions on Venezuela are not only very diverse and comprehensive: EU and Third Country sanctions also cover a range of various types of activities, persons, entities and currencies.

K&H Bank will not process transactions in USD, GBP nor CAD, involving Venezuela or Venezuelan parties.

K&H Bank will only process non-USD, non-GBP or non-CAD transactions for its own customers and after a thorough screening of the transaction details to ensure that the transaction is legally allowed and within the limits of K&H Bank's internal policy regarding Venezuela (please consult your K&H Bank contact person for more information).

SUDAN AND SOUTH-SUDAN

The majority of sanctions wrt. Sudan and South-Sudan have been revoked, with the exception of some so-called name sanctions or asset freezes.

Therefore, and irrespective of the currency, K&H Bank will only process transactions for its own customers (both trade related and retail transactions), to make sure that transactions are allowed according to the applicable designations.

III. RULES ON DUAL-USE EXPORT CONTROLS

K&H BANK will not process any transaction or financial transaction related to the export of dual-use items without the authorization of the competent authority. In order to be able to verify whether a transaction complies with all dual-use export control rules, the necessary documentation (invoices, authorization or license, etc.) will be requested, and as a result, it is possible that the processing of related payments is significantly delayed.

What are dual-use items?

Dual-use items are goods, software and technology that can be used for both civilian and military applications. The export of such items is restricted by the EU, US, UK and a wide range of other countries. The below short summary focuses on the dual-use export restrictions imposed by the EU.

EU general restrictions with respect to dual-use

The EU imposes restrictions with respect to the export, transit, brokering and technical assistance of dual-use items so that it can contribute to international peace and security and prevent the proliferation of Weapons of Mass Destruction (WMD).

The EU Regulation 2021/821 (the EU Dual-Use Regulation) governs the EU's export control regime and includes a common EU list of dual-use items (in Annex I to the Regulation) and the rules for obtaining authorizations/licenses. In certain cases, EU Member States may introduce additional controls on non-

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listed dual-use items because of public security or human rights considerations, or to ensure items are not for military uses or end-users.

Dual-use items may be traded freely within the EU, except for some particularly sensitive items, whose transfer within the EU remains subject to prior authorization.

EU sanctions against **Russia and Belarus** impose further export restrictions concerning dual-use goods and technologies. The export of these items has been prohibited (i.e. no license or authorization possible) even when these items are intended for civilian end-users or uses.

EU sanctions against **Myanmar** prohibit the export of dual-use goods and technology if those items are or may be intended for military use or military end-users.

As regards exports to **Syria**, it should be noted that EU Member States can prohibit the export of dual use items, or impose an authorization requirement.

UN: <https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>

EU: https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en#guidance

US (OFAC): <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>

UK (OFSI): <https://www.gov.uk/government/organisations/office-of-financial-sanctionsimplementation>