



## KYC AND ANTI-MONEY-LAUNDERING PRACTICES IN OP POHJOLA

### Organization

OP Pohjola is Finland's largest financial services group. It provides its customers extensive and diversified range of banking, investment and insurance services. OP Pohjola's business consists of the following three business segments: Retail Banking (Banking for private and SME customers), Corporate Banking (Banking for corporate and institutional customers), and Insurance (Insurance customers).

OP Pohjola's operations are based on the cooperative principle. OP Pohjola consists of 76 (30.4.2025) independent member cooperative banks and OP Cooperative, which they own, including OP Cooperative's subsidiaries and closely related companies. OP Cooperative is the central institution of the amalgamation of the cooperative banks. The cooperative's members are the amalgamation's deposit banks and other credit institutions. By virtue of Laki talletuspankkien yhteenliittymästä (Act on the Amalgamation of Deposit Banks), the central institution has both the right to control its credit institutions and the obligation to supervise their operations. OP Cooperative carries out control and supervision duties from its position at the head of the financial and insurance conglomerate formed by OP Pohjola. It also acts as the OP Pohjola's strategic owner institution.

OP Cooperative's mission is to create the basis for OP Pohjola's unity and success. Its task is to supervise and steer the OP Pohjola's business in line with the jointly agreed strategy. OP Cooperative also analyses the operating environment and gathers information on changes in the industry. It oversees the OP Pohjola's corporate image, reputation and brands.

### AML, CTF and sanctions policies and procedures

OP Pohjola is subject to the national regulation in relation to money laundering and terrorist financing based on Directives of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and the Financial Action Task Force on Money Laundering's recommendations. OP is also subject to regulation set out the Finnish Financial Supervisory Authority, FIN-FSA as well as legislation and regulation set out by the Finnish Government and Parliament.

OP Pohjola as a credit institution is supervised by the European Central Bank (ECB). The Finnish Financial Supervisory Authority oversees OP Pohjola's investment firms and insurance companies in Finland as prescribed in legislation governing financial and insurance markets. OP Pohjola's operations in Estonia, Latvia and Lithuania are supervised to an applicable extent by the national regulators. The Financial Supervisory Authority, FIN-FSA, is responsible for ensuring that the procedures, risk management and internal control of supervised entities concerning AML/CTF issues meet statutory requirements.

OP Pohjola has sound documented instructions and internal controls in place regarding knowing your customer, prevention of money laundering and terrorist financing and sanctions. OP Pohjola's AML and Sanctions Policy confirms the principles based upon which OP Pohjola manages ML/TF risks and the risk of non-compliance with sanctions and prevents the use of OP Pohjola entities or their services for criminal or un-ethical ends. OP Pohjola's policies and procedures take into account the applicable obligations related to foreign tax reporting and financial institutions' ability to detect and prevent tax evasion as part of complying with anti-money laundering and other anti-financial crime regulations. The Code of Business Ethics document and OP Pohjola's AML and Sanctions Policy ratified by the Supervisory Board of OP Cooperative specifies that employees shall avoid and report any situation that may put them, their customer or OP Pohjola under suspicion of bribery.



In our policies and procedures, we pay attention to the fact that conflicts occurring in the world and the resulting increase in the number of refugees and economic uncertainty increase the risk of human trafficking and violation of human rights, for example by monitoring signals of potential human trafficking.

In addition to OP Pohjola -level policies and procedure guides, entities ensure that they have drawn up sufficiently detailed instructions which consider the special characteristics of their own business. Instructions can be accessed by the employees of the OP Pohjola companies via the OP Pohjola's intranet.

The KYC, AML/CTF and sanctions policies and programs are applicable to all agencies, branches and subsidiaries of OP Pohjola companies and they are obliged to comply with the policies. Subsidiaries and branches operating abroad have detailed KYC and AML instructions in place taking account of the requirements established by local legislation and the policies and programs of OP Pohjola.

#### Customer acceptance, identification and customer due diligence

OP Pohjola has developed and implemented customer acceptance policy and procedure to identify customers or groups of customers that probably pose a greater risk of money laundering or terrorist financing to the OP Pohjola's companies' risk assessment.

We treat our customers equally and fairly. In establishing and maintaining a customer relationship, we observe the contractual terms and regulation in force. OP Pohjola must ensure compliance with equality regulation and promote equality in the provision of all services. In addition to risk management associated with money laundering, terrorist financing and sanctions, it is necessary to assess activities from the perspective of financial inclusion. The assessment must consider what the impacts on the customer's or a group of customers have if they have no possibility to use certain products or services. In addition to managing risks, the aim is to secure equal prerequisites for economic activities and the availability of essential services. Instead of the management of risks, prohibited de-risking avoids risk associated with customer relationship by ending and restricting customer and business relationships with entire customer groups assessed as involving a high risk.

The KYC, AML/CTF and sanctions policies contain detailed instructions in accordance with the legislation and regulation mentioned above concerning customer identification and customer due diligence.

The OP Pohjola companies do not enter or maintain relationships with shell banks. OP Pohjola companies do not maintain either anonymous or numbered accounts nor payable through accounts.

#### Transaction monitoring and reporting obligation

In addition to manual procedures, OP Pohjola has electronic tools in place for transaction monitoring, screening and CDD. In case the customer's activities or transactions are deemed suspicious, the OP Pohjola companies' employees are obligated to report suspicious activity to the local FIU. In practice employees of the OP Pohjola companies have the obligation to report suspicious customer activity to the OP Pohjola AML Investigation and MLRO team who will in their turn report the case to the local FIU.

#### Documentation and storing of CDD data

Customer identification and customer due diligence are documented, updated and stored in accordance with the Act on Preventing Money Laundering and Terrorist Financing (444/2017) including its amendments.

The period of storage of customer due diligence data and related documentation is five years from termination of the customer relationship or, in case of an occasional business transaction, for five years from the performance of the business.



Information obtained for the purpose of fulfilling the obligation to obtain information and the reporting obligation is kept separate from customer data.

#### Training of Employees

OP Pohjola companies offer regularly training for personnel on matters and liabilities relating to KYC, AML/CTF and sanctions. Training is compulsory, provided on a regular basis and covers all organizational levels.