



General Statement on Observance of Anti-Money Laundering Requirements

PAA Capital Group and its branches, affiliates, and subsidiaries (collectively referred to hereinafter as "PAA CAPITAL") are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist and criminal activities.

PAA CAPITAL SE has its headquarters in the Czech Republic and is supervised by the Czech National Bank.

PAA Capital (Pty) Ltd. has its headquarters in Gaborone, Botswana and is supervised by the Ministry of Finance & Development Authority.

PAA Capital Group of Companies has its legal Management residing in Germany.

The Federal Republic of Germany is a member country of the Financial Action Task Force (FATF) and the European Union (EU) and has enacted laws and rules designed to implement the antimoney laundering policies of both FATF and the EU. The goal of these laws is to detect and prevent money laundering and potential terrorist financing.

PAA Capital Group has implemented an Anti-Money Laundering (AML) program that is designed to comply with certain required German AML rules as a minimum standard throughout the bank as well as with all local laws, regulations, and guidance relating to the prevention of money laundering, terrorist financing, and related financial crimes. The AML-program include written policies and procedures, a designated AML-Officer, regular training for relevant employees, and an independent audit to test the implementation of the program.

PAA Capital Group of Companies has adopted the Wolfsberg Anti-Money Laundering principles as well as the Wolfsberg statement concerning terrorist financing (www.wolfsberg-principles.com).

As part of its Anti-Money Laundering and Anti-Terrorist compliance efforts, PAA CAPITAL takes steps to ensure that it complies with any and all embargo regulations applicable in the EU and in the jurisdiction in which any respective branch or office is domiciled. The Institution maintains lists that are compiled on the basis of multiple sources, including the EU, and the Office of Foreign Assets Control (OFAC). PAA CAPITAL uses its best efforts to ensure compliance with these prohibitions and restrictions and to detect suspicious activities. Depending on the jurisdiction and business line, PAA CAPITAL operates technical systems and/or manual monitoring systems to detect potential suspicious activities. Any such suspicious activities detected are reported to law enforcement in accordance with applicable local laws.

If you have any questions or require additional information regarding PAA CAPITAL's Anti-Money-Laundering efforts, please contact:

Cem Wald, CEO of the Institutions

Cordially,

