

**Summary of Danske Bank's global policy  
to prevent money laundering and financing of terrorism**

It is the global policy of Danske Bank – including all branches and subsidiaries, domestic as well as foreign – to take all necessary steps to comply with the rules regarding money laundering and combating the financing of terrorism. The global policy includes establishing adequate procedures of customer due diligence, reporting, record keeping, internal control, risk management and communication in order to forestall and prevent operations related to money laundering or financing of terrorism. In addition, the Bank's branches and subsidiaries that are located abroad are required to comply with the applicable money laundering and anti-terrorism legislation in the country in question.

Concerning relationships with correspondent banks and other financial institutions, the Bank has set up special international guidelines covering the entire Danske Bank Group.

For Denmark the following applies:

The money laundering rules in Denmark are contained in Act No. 117 of 27 February 2006 on measures to prevent money laundering and financing of terrorism. The Act implements Directive 2005/60/EC of the European Parliament and of the Council on prevention of the use of the financial system for the purpose of money laundering and terrorist financing as well as the revised FATF recommendations of 2003\*.

Danske Bank is regulated by the Danish Financial Supervisory Authority (*Finanstilsynet*, [www.dfsa.dk](http://www.dfsa.dk)), which ensures that all Danish banks comply with applicable legislation and that they have adequate business procedures, control measures and auditing systems. The Authority also ensures that banks comply with the money laundering and anti-terrorism legislation, including the Know Your Customer rules.

Danske Bank's Group Anti-Money Laundering department is in charge of the Bank's internal procedures to prevent money laundering and financing of terrorism and also handles the reporting of suspicious transactions to the Public Prosecutor for serious economic crime. For inquiries regarding the issue, please contact Danske Bank A/S, Group Anti-Money Laundering, Holmens Kanal 2-12, DK-1092 Copenhagen K.

Our internal procedures are accessible to all employees via the IT system.

Reporting takes place without the disclosure of the employee's identity in order to provide protection for employees. Furthermore, all employees of Danske Bank who come directly or indirectly into contact with customers have been trained to deal with and respond to transactions that raise a suspicion of money laundering or the financing of terrorism.

Know Your Customer (KYC) procedures must always be complied with when customers open accounts and establish a new business relationship. The Bank's KYC procedures are conducted on the basis of a risk-based approach. Anonymous accounts are not established.

Information concerning a customer's identity is archived for a period of at least five years after the termination of the customer relationship. Further, documents and records concerning

transactions are kept on file for a period of at least five years after the transactions have taken place.

Danske Bank does not have direct business relationships with banks that are not physically present in any country (shell banks).

The Bank also has internal audit procedures to ensure that the Bank fulfils its obligations under the money laundering and anti-terrorism rules and the Bank's business procedures.

Danske Bank has electronic systems in place whereby the Bank, on an ongoing basis, controls all persons, firms and organisations mentioned in EU terrorism lists as well as monitoring suspicious transactions. The Bank conducts ongoing due diligence in all business relationships on a risk-sensitive basis.

\* The Act implements parts of the FATF Special Recommendations. The implementation of the remaining Special Recommendations awaits EU legislation.