



**Regulation of FuturAqua Private Limited Company  
on the prevention and combating of money laundering and terrorist financing and on the execution of  
restrictive measures on liquid assets and other financial interests imposed by the European Union and  
the UN Security Council**

**Effective as of  
22 April 2020 until revocation**

## I. PURPOSE OF THE REGULATION

The purpose of the present Regulation (hereinafter referred to as “Regulation”) is to ensure for **FuturAqua Private Limited Company** (hereinafter referred to as “**FuturAqua Plc.**”) the uniform order and regulate the activities relating to the prevention and combating of money laundering and terrorist financing on the basis of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter referred to as “Act on Money Laundering”) and of Act LII of 2017 on the Implementation of Restrictive Measures on Liquid Assets and Other Financial Interests ordered by the European Union and the UN Security Council (hereinafter referred to as “Act on Restrictions”) and to ensure that every employee of **FuturAqua Plc.** complies with the obligations of shareholder and contracting partner due diligence and reporting prescribed in the Act on Money Laundering.

## II. PERSONS COVERED AND THE SCOPE OF THE REGULATION

The persons covered by the Regulation are all organisational units and employees of **FuturAqua Plc.**

The scope of the Regulation covers the **production of Soft drinks and mineral water** preventing and combating of money laundering and terrorist financing and the **listing of the related stocks to the stock exchange**, the risk assessment, due diligence and monitoring of the shareholders and contracting partners, the execution of tasks related to the reporting and registering suspicious financial operations, the suspension of transactions and the execution of restrictive measures **on liquid assets and other financial interests.**

## III. RELEVANT LAWS AND REGULATIONS

Relevant laws and regulations:

- Act on Money Laundering,
- Act on Restrictions,
- Act C of 2012 on the Criminal Code (hereinafter referred to as “Criminal Code”) and Act IV of 1978 (hereinafter referred to as “Previous Criminal Code”),
- Act V of 2013 on the Civil Code (hereinafter referred to as “Civil Code”) and Act IV of 1959,
- Act LIII of 1994 on Judicial Execution,
- Government Decree 485/2015. (XII. 29.) on the scope of authority and competence of certain organs of the National Tax and Customs Administration,
- Act XC of 2017 on Criminal Procedure and Act XIX of 1998,
- Decree 21/2017. (VIII.3.) of the Ministry for National Economy on the particulars of internal regulations to be prepared under Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing and Act LII of 2017 on the Implementation of Financial and Asset-Related Restrictive Measures (hereinafter referred to as “MNE Decree”),
- Decree No. 45/2018 (XII. 17.) MNB on the Rules on the Implementation of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing as Apply to Service Providers Supervised by the MNB and the 3 Detailed Rules on the Minimum Requirements Applying to the Development and Operation of the Screening System Stipulated in the Act on the Implementation of Restrictive Measures Imposed by the European Union and the UN Security Council Relating to Liquid Assets and Other Financial Interests (hereinafter referred to as “MNB Decree”).

## IV. DEFINITIONS

Under this Regulation

1. **employee:** under this Regulation, the leader and employee of the Service Provider and the contributing family member thereof;
2. **audited electronic means of communication:** audited electronic system suitable for carrying out due diligence remotely and through electronic data transmission channels, making the customer statements, interpreting and storing safely the statements made by the customer and retrieve and control the stored data;
3. **identification:** recording in a traceable manner the data of the customer, agent, proxy, authorised representative acting before the service provider and the beneficial owner defined in the Act on Money Laundering;

4. **electronic money:** electronic money defined in the Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (hereinafter referred to as “CIFE”);
5. **electronic money institution:** the electronic money institution defined in the Act CCXXXV of 2013 on Payment Service Providers (hereinafter referred to as “PSP”);
6. **electronic customer identification system:** personalised electronic procedure that makes it available to provide legal statements in a way that the person of the declarant and the date of the statement and to retrieve the unchanged content of the legal statement;
7. **European Union:** European Union and the European Economic Area;
8. **member state of the European Union:** member state of the European Union and other states participating in the agreement on the European Economic Area;
9. **resolution of the United Nations Security Council:** resolution of the UN Security Council on maintaining international peace and security, made in accordance with Article 25 of the Charter of the United Nations implemented by Act I of 1956;
10. **shell bank:** a credit institution, financial services institution or credit institution, an institution engaged in equivalent activities, established in a state in which it has no head office and which is unaffiliated with a regulated financial group;
11. **FIU:** in relation to the provisions of the Act on Money Laundering the authority operating as a financial intelligence unit (Financial Intelligence Unit) and in relation to the provisions of the Act on Restrictions the body responsible for the implementation of financial and asset-related restrictive measures;
12. **negotiable credit token:** the negotiable credit token defined in the CIFE;
13. **head office:** the place where the service provider conducts its principal activity and where ultimate decision-making takes place;
14. **third country:** any state that is not a member of the European Union;
15. **attested translation:** translation made by the Hungarian Office for Translation and Attestation;
16. **official translation:** revised, stamped, stapled translation issued with official seal, which certifies with official certification clause that the translation prepared is identical to the text received by the translation office;
17. **unincorporated organisation:** any legal entity other than legal persons and natural persons;
18. **politically exposed person:** a natural person who is entrusted with prominent public functions, or who has been entrusted with prominent public functions within at least one year before the implementation of customer due diligence measures;
19. **politically exposed person entrusted with prominent public functions:**
  - a) heads of State, heads of government, ministers and deputy ministers, state secretaries, in Hungary the head of State, the Prime Minister, ministers and state secretaries,
  - b) members of parliament or of similar legislative bodies, in Hungary members of parliament and spokesmen for the nationality,
  - c) members of the governing bodies of political parties, in Hungary members and officers of the governing bodies of political parties,
  - d) members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, in Hungary members of the Constitutional Court, of the courts of appeal and the Curia,
  - e) members of courts of auditors or of the boards of central banks, in Hungary the President and Vice-President of the State Audit Office, members of the Monetary Council and the Financial Stability Board,
  - f) ambassadors, chargés d’affaires and high-ranking officers in the armed forces, in Hungary the head of the central body of law enforcement bodies and organisations and his deputy, Chief of Staff of the Hungarian Army and Deputy Chiefs of Staff of the Hungarian Army,
  - g) members of the administrative, management or supervisory bodies of enterprises with majority state ownership, in Hungary the managing directors of enterprises with majority state ownership, including members of the management body exercising control or supervisory rights of such enterprises,
  - h) directors, deputy directors and members of the board or equivalent function of an international organisation, or any other person performing equivalent duties;
20. **family members of politically exposed person:** the spouse or domestic partner of a politically exposed person; the biological and adopted children, stepchildren and foster children and their spouses or domestic partners, of a politically exposed person; the biological, adoptive, step- and foster parents of a politically exposed person;
21. **persons known to be close associates of politically exposed persons:**
  - a) any natural person who is known to have joint beneficial ownership of legal entities or unincorporated

- organisations, or any other close business relations, with a politically exposed person,
- b) any natural person who has sole beneficial ownership of a legal entity or unincorporated organisation which is known to have been set up for the benefit of a politically exposed person;
22. **risk profile:** general nature of the risk remaining after decreasing the identified money laundering and terrorist financing risks, including the type and level of risk;
23. **level of risk:** in relation to permanent business relationships, a classification to determine the level of customer due diligence measures which are to be carried out for a specific customer;
24. **risk factors:** variables that individually or in combination with each other may increase or decrease any business relationship or ML/TF risk caused by any transaction;
25. **external audit function:** an audit of the internal policies by a person independent of the service provider to determine whether the service provider is capable to fulfil, based on such internal policies, the obligations set out in the Act on Money Laundering and in other legislation adopted by its authorisation;
26. **custodian wallet provider:** an entity that provides services to safeguard private cryptographic keys on behalf of its customers, to hold, store and transfer virtual currencies;
27. **MNB:** the abbreviation of the National Bank of Hungary, the supervisory body defined in Section 5 Subsection a) of the Act on Money Laundering and the authority defined in the Act XV of 2014 on Trustees and the Role of their Activities;
28. **monitoring:** constant monitoring of the business relationship;
29. **national risk assessment:** an assessment at national level intended to identify, evaluate and interpret the risk of money laundering and terrorist financing, including the ongoing review thereof, and to define national risk management procedures;
30. **complex ownership structure:** the ownership structure is complex compared to the type of business activity of the company if
- 1.a) in the ownership structure, the companies are mutual owners of each other by the involvement of more than three companies and by way of merger or
  - 1.b) owners with indirect shares are included in the ownership structure on more than three levels or
  - 1.c) in the ownership structure there are more than four legal entities or unincorporated organisations with holdings;
- <https://www.mnb.hu/felugyelet/szabalyozas/penzmosas-ellen/szabalyzatok-segedletek>
31. **transfer of funds:** transfer of funds defined in Section 9 of Decree 2015/847 on the data accompanying transfers of funds;
32. **payment institution:** the payment institution defined in the PSP and the institution operating the Postal Clearing Center;
33. **money laundering:** conducts defined in Sections 303-303/A of the Previous Criminal Code and in Sections 399-400 of the Criminal Code;
34. **money laundering and terrorism financing risk:** the probability and effect of money laundering and terrorism financing;
35. **national financial intelligence unit:** a department of the National Tax and Customs Authority (FIU) delegated by the relevant legislation;
36. **restrictive measures on liquid assets and other financial interests:**
- 36.a) freezing of assets and economic resources based on any legal act of the European Union or resolution of the UN Security Council,
  - 36.b) the prohibition stated in any legal act of the EU and resolution of the UN Security Council of making available the assets and economic resources,
  - 36.c) prohibition and limitation related to transactions (transfers of funds) rendered in the cases defined in any legal act of the EU and resolution of the UN Security Council, furthermore the related authorisation procedure;
37. **subject of restrictive measures on liquid assets and other financial interests:** natural persons, legal entities or unincorporated organisations falling under the scope of any legal act of the EU rendering the restrictive measures on liquid assets and other financial interests or any resolution of the UN Security Council, furthermore members of natural persons, legal entities or unincorporated organisations that fall under the scope of any legal act of the EU rendering the restrictive measures on liquid assets and other financial interests or any resolution of the UN Security Council;
38. **financial services institution:**
- a) financial enterprises,
  - b) entities engaged in money processing activities, other than financial enterprises, in respect of their money processing operations,

- c) payment institutions, in respect of their activities falling within the framework of payment services,
  - d) electronic money institutions, in respect of their activities falling within the framework of issuance of electronic money and payment services,
  - e) issuers of credit tokens,
  - f) currency exchange offices,
  - g) insurance companies, if authorised to pursue life insurance activities, in respect thereof,
  - h) multiple agents and brokers provided for in Act LXXXVIII of 2014 on the Business of Insurance as regards their activities relating to contracts within the life insurance branch,
  - i) multiple special services intermediaries and brokers defined in the CIFE,
  - j) investment firms,
  - k) commodity dealers, in respect of their activities falling within the framework of commodity exchange services,
  - l) investment fund managers, in respect of the marketing of investment units, and in respect of their activities provided for in Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities (hereinafter referred to as IRA);
  - m) market operators in respect of their activities defined in Act CXX of 2001 on the Capital Market (hereinafter referred to as “CMA”) and in the IRA;
39. **high-risk third countries with strategic deficiencies:** the countries provided for in Commission Delegated Regulation (EU) 2016/1675 of 14 July 2016 supplementing Directive (EU) 2015/849 of the European Parliament and of the Council by identifying high-risk third countries with strategic deficiencies;
40. **official document suitable for identification purposes:** a personal identification document (identity card), passport and driver’s license card;
41. **verification of identity:** the procedure to verify the identity of the customer, agent, proxy or other authorised representative and to verify the identity of the beneficial owner;
42. **terrorist financing:** the provision or collection of funds with the intention that they should be used in order to carry out any of the offences within the meaning of Subsections (1) and (2) of Section 261 of the Previous Criminal Code, or either of the conduct defined in Section 318 of the Criminal Code;
43. **beneficial owner:**
- a.a) any natural person who owns or controls at least twenty-five per cent of the shares or voting rights in a legal person or an unincorporated organisation directly or, by way of the means defined in Subsection (4) of Section 8:2 of the Civil Code indirectly, or who is able to exercise effective control over the legal person or unincorporated organisation via other means, if that legal person or unincorporated organisation is not listed on a regulated market and is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards,
  - a.b) any natural person who has a dominant influence in a legal person or unincorporated business association as defined in Subsection (2) of Section 8:2 of the Civil Code,
  - a.c) any natural person on whose behalf a transaction is being conducted, or who is able to exercise effective control over the activity of a customer via other means in the case of natural persons,
  - a.d) in the case of foundations:
    - a.i. where the future beneficiaries have already been determined, the natural person who is the beneficiary of twenty-five per cent or more of the property of the foundation,
    - a.ii. where the individuals that benefit from the foundation have yet to be determined, the natural person in whose main interest the foundation is set up or operates,
    - a.iii. the natural person who exercises control in the management of the foundation or exercises control over at least twenty-five per cent of the property of the foundation, or
    - a.iv. in the absence of a natural person provided for in Subparagraphs i-iii., the person who is authorised to represent the foundation,
  - a.e) in case of fiduciary asset management contracts, the following persons:
    - 6.i. the principal(s) - if the principal is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
    - 6.ii. the fiduciary(ies) - if the fiduciary is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
    - 6.iii. the beneficiaries or class of beneficiaries - if the beneficiary is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
    - 6.iv. any natural person exercising effective control over the trust fund via other means, and

- 6.v. the protector(s), if any - if the protector is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof; furthermore
- a.f) in the absence of the natural person referred to in Paragraphs a) and b), the executive officer of the legal person;
44. **legal acts of the European Union:** legal acts of the European Union adopted in accordance with Article 75 and 215 of the Treaty on the Functioning of the European Union;
45. **customer:** any person entering into a business relationship or with the service provider, or who places an order with the service provider to carry out a transaction and in case of FuturAqua Plc., the customer falls into the same category as the shareholders and contracting partners of the company;
46. **customer due diligence measures:** identification, risk classification of the customer, verification of its identity, identifying and continuously monitoring the objective and nature of the business relationship and the transaction order, monitoring of customers regularly giving transaction orders, provision of the statement of the customer or the representative of the legal person or unincorporated organisation, verification of identity of the beneficial owner, provision of the statement of politically exposed persons;
47. **transaction:**
- 1.a) an operation comprising a part of a service provided under business relationship by the service provider within its professional activities, or
- 1.b) transaction order;
48. **transaction order:** a transaction that is a temporary relationship established by contract between a customer and a service provider pertaining to the services of the service provider falling within its professional activities specified in the Act on Money Laundering;
49. **establishing the source of wealth:** a statement made by the customer demonstrating the source of the customer's financial means, including tangible and intangible assets, of a value over three million forints;
50. **virtual currency:** a digital representation of value that is not issued or guaranteed by a central bank or a public authority, it does not possess a legal status of currency or money, but is accepted as a means of exchange and which can be transferred, stored and traded electronically.

## PART 1: PROVISIONS IN ACCORDANCE WITH THE ACT ON MONEY LAUNDERING

### V. EXECUTION OF CUSTOMER DUE DILIGENCE OBLIGATION AND MEASURES

#### V.1. Customer due diligence obligation

**FuturAqua Plc.** shall apply customer due diligence measures in the case of its shareholders and contracting partners:

- a) when establishing a business relationship;
- b) when carrying out an occasional transaction that amounts to four million five hundred thousand forints or more;
- c) when carrying out an occasional transaction that constitutes a transfer of funds exceeding three hundred thousand forints;
- d) when there is any information, fact or circumstance giving rise to a suspicion of money laundering or terrorist financing, where the due diligence measures referred to in the above paragraphs have not been carried out yet;
- e) when there are doubts about the veracity or adequacy of previously obtained customer identification data. This covers also the case when any data of the customer (e.g. name, home address and seat, etc.), or the ownership structure of a customer that is an entity other than natural person, is changed. In case the change occurred in the management or representatives of an entity other than natural person, it shall be verified whether there has been any change in the data recorded during due diligence, or the conditions relevant for the statement of the beneficial owner;
- f) where changes in customer identification data are recorded and the customer due diligence shall be repeated on the basis of risk sensitivity approach.

The due diligence obligation shall also apply to any series of related transactions with a combined value in the amount of four million five hundred thousand forints or three hundred thousand forints in case of currency exchange. In this case, due diligence measures shall be carried out in connection with the acceptance of the transaction that brings the total value of the transactions to the amount of four million five hundred thousand forints or three hundred

thousand forints in case of currency exchange.



When entering into a business relationship, the service provider shall establish and set out in writing **the classification of the shareholder's and contracting partner's risk level** in the context of customer due diligence.

Measures to be applied when **entering into a business relationship** are defined in Section V.2 and the due diligence measures applicable to **transactions** defined in Section V.1 are defined in Section V.3.

## **V.2. Customer due diligence measures applicable when entering into a business relationship.**

### V.2.1 General rules

**FuturAqua Plc.** ensures that the available data related to the shareholders, contracting partners and its business relationships are updated. For this purpose, **FuturAqua Plc.** conducts simplified customer due diligence (defined in Section V.3.). In case the shareholder or the contracting partner exceeds the limit prescribed by law, or initiates any transaction/purchase or selling of shares, the due diligence shall be performed in person and in accordance with the general rules (record the statements of the shareholder or the contracting partner (beneficial owner, PEP), and verify the validity of the documents and make copies of them).

**FuturAqua Plc.** conducts enhanced customer due diligence (in accordance with Section V.4.). **FuturAqua Plc.** checks in every 5 years the available data related to the verified customers based on the Act on Money Laundering. In case there is any doubt during the verification regarding the timeliness of the data and statements, the customer due diligence measures shall be repeated.

**FuturAqua Plc.** indicates on the forms and entry declarations used in customer due diligence that, during the existence of the business relationship, the shareholders and contracting partner shall notify **FuturAqua Plc.** about the change in the provided data within 5 working days of the day when such information is received.

*The customer due diligence measures are not requested to be carried out again where:*

- the customer due diligence measures were already completed during the previous sale of the shareholder's share or in relation to any of its other contract,
- the verification of the identity of the customer, the customer's agent, proxy or other authorised representative in connection with prevailing business relationships or transactions, was already completed, and
- in case the shareholder or contracting partner has filled out data change form prepared and provided by **FuturAqua Plc.** (for example by downloading it from its website), and sent its data changes by post to 7011 Alap, Dózsa György u. 81-83 or in e-mail to info@futuraqua.hu.

### V.2.2. Identification and verification of identity

In the cases defined in Section V.1, the natural person shareholders and contracting partners (legal representative, death beneficiary, heir and proxy), furthermore the legal entities or unincorporated organisations shall be identified, i.e. their following data shall be recorded:

#### *A. In case of natural persons:*

1. family name and first name,
2. family name and first name at birth,
3. nationality,
4. date and place of birth,
5. mother's maiden name,
6. home address or habitual residence in the absence thereof,
7. number and type of document verifying home address,
8. number and type of identification document,
9. validity of identification document.

#### *B. In case of legal persons or unincorporated organisations:*

1. name, abbreviated name,
2. registered office, or the address of the Hungarian branch of foreign companies, if applicable,
3. main activities,
4. name and position of the authorised representatives,
5. identification data of its delivery agent,
6. the registered number of legal persons listed in the companies register, or the number of the resolution adopted on

the foundation (registration and admission into the register) of other legal persons, or their register number, 7. tax number.

In case of business relationship, the minimum data are the type, subject matter and term of the contract, and in case of transactions, the scope and amount of the transaction provided that, taking into consideration Act XCVI of 1993 on Voluntary Mutual Insurance Funds, the scope of the contract is the establishment of membership and its term ends with the termination of membership (which shall not be defined when entering or requesting the service).

### V.2.3. Documents to be submitted

For the purposes of identification and verification procedures, **FuturAqua Plc.** requires the following documents to be presented, or shall be entitled to request data from a public register:

*In case of natural persons:*

1. official document suitable for identification purposes and official residence card for Hungarian citizens, in the case of the latter if the permanent residence or habitual residence is in Hungary,
2. passport or personal identification document for foreign nationals, if it embodies an authorisation to reside in Hungary, document evidencing the right of residence or a valid residence permit, official residence card in proof of having a home address in Hungary, if the permanent residence or habitual residence is in Hungary.

*In case of legal persons and unincorporated organisations,*

in addition to the documents of the persons acting in their name or on their behalf, a document issued within thirty days to date, to verify:

1. that the company has been registered by the court of registry, or that the application for registration has been submitted, in case of a private entrepreneur, a notification has been submitted concerning the taking up of entrepreneurial activities or that the private entrepreneur has been registered,
2. for other domestic legal persons not covered under point 1., whose existence is subject to registration by an authority or court, the document of registration,
3. for foreign legal persons and unincorporated organisations, the document proving that it has been entered or registered under the law of the country in which it is established.

*In case of request for company registration, or registration in the registry of court or the competent authority:*

1. the instrument of constitution of legal persons and unincorporated organisations prior to the submission of the request for company registration, or registration in the registry of the court or the competent authority.

In this case the legal person or unincorporated organisation shall produce documentary evidence of being registered by the court of registry, the competent authority or court, within thirty days after the fact, and **FuturAqua Plc.** shall enter the registered number or other register number into its records.

In the process of verification of identity, in the case of agents, the validity of the power of attorney, and in the case of other authorised representatives, the legal title of the representation and the representative's entitlement shall be checked.

Copies shall be made of the presented documents.

For the purpose of verification of identity, the service provider must check the validity of the presented identification documents, and in that context shall ascertain the authenticity of such documents.

Verification of the following data is not required if not contained in the document provided for the verification of identity: surname and forename by birth, nationality, mother's maiden name. The fact that these data had been recorded in the absence of the verification shall be recorded.

#### V.2.4. Identification of beneficial owners

In the course of customer due diligence, the natural person shareholder and contracting partner are required to provide a written statement by way of physical presence, **Annex 2** (beneficial ownership statement of the customer), in case he is acting in the name or on behalf of the beneficial owner.

The customer's authorised representative of a legal person or an unincorporated organisation, is required to provide a written statement, relying on the customer's accurate and up-to-date records, by way of physical presence, or via the service provider's safe, secure and previously audited electronic means of communication, **Annex 3** (beneficial owner statement of to be completed by the legal persons or the unincorporated organisation customer).

In the statement the following data of the beneficial owner shall be recorded:

1. family name and first name;
2. name at birth and first name;
3. nationality;
4. date and place of birth;
5. home address or habitual residence in the absence thereof;
6. In case the customer is a legal person or an unincorporated organisation, the nature and extent of ownership interest.

The shareholder and contracting partner shall provide a statement also on whether the beneficial owner is a politically exposed person. If the beneficial owner is a politically exposed person, he shall complete the statement of beneficial owner related to the politically exposed persons, **Annex 4** (declaration of politically exposed person of the beneficial owner). The statement shall also indicate the specific provision of the law under which the beneficial owner is considered politically exposed.

In case of natural persons where there is any doubt concerning the identity of the beneficial owner, the service provider shall take any additional measure insofar as the person of the beneficial owner can be positively identified.

Where there is any doubt concerning the identity of the beneficial owner in case of legal persons or unincorporated organisations, the service provider shall take any additional measure insofar as the person of the beneficial owner can be positively identified, **including the understanding of the ownership and control structure of the customer**.

The service provider shall take measures to verify the beneficial owner's identification data on the basis of documents presented, publicly-accessible records and registers, or other similar registers the operators of which are required by law to supply information to **FuturAqua Plc**.

If the customer is a legal person or unincorporated organisation, the authorised representative shall indicate in his statement all natural persons to whom the definition under Point 38 of Section 3 of the Act on Money Laundering applies as beneficial owner.

In those cases when there are also entities other than natural persons among the owners of the customer, natural persons who own or control at least 25% of the shares or voting rights all along in the ownership structure and have effective influence on the decisions and activities of the customer shall also be taken into consideration when defining the beneficial owner.

When establishing business relationship, the customer shall certify that the data referring to the beneficial owner was forwarded to the central register defined in Subsection (1) of Section 25 of the Act on Money Laundering. This provision is effective as of 1 December 2020.

If the beneficial owner of a legal person or unincorporated organisation customer is the executive officer according to Point 38 of Section 3, the service provider shall identify the executive officer and shall verify his identity. The service provider shall record the customer due diligence measures taken, including information concerning the possible failure of such measures.

#### V.2.6. Monitoring, strengthened procedure

The business relationship shall be constantly monitored, including the scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the information the service provider has in its possession on the shareholder contracting partner.

#### V.2.6. Termination of business relationship

No business relationship shall be established, the already existing business relationship shall be terminated and the transaction shall not be completed in case the result of the customer due diligence prescribed by the Act on Money Laundering is not entirely available, therefore in case the due diligence of the customer shall not be conducted with full effect, i.e. when:

- the shareholder or contracting partner rejects the beneficial owner statement,
- there is any doubt concerning the identity of the beneficial owner and the Service Provider took every necessary steps to identify the beneficial owner and verify its identity, including the understanding of its ownership and management structure and the doubt still exists,
- in case of doubt remaining after verification in publicly available register or any other register from the operator of which the service provider is entitled by law to request data,
- the source of the financial asset and in certain cases the fund was not clarified to **FuturAqua Plc.** without any uncertainty.

#### **V.3. Customer due diligence when carrying out transactions**

The shareholder, contracting partner, their agent or proxy or other authorised representative acting before the service provider shall be identified and the verification of their identity shall be conducted when carrying out a transaction exceeding four million five hundred thousand forints.

While doing so, **FuturAqua Plc.** records the **data defined in Section V.2.2**, of the persons belonging to its shareholder, furthermore that of the transaction and the contracting partner, **Annex 1** (Identification Form).

In order to verify identification **FuturAqua Plc.** requires the submission of documents defined in **Section V.2.3** or shall be entitled to request data from a public register.

#### **V.4. Defining the status of a politically exposed person**

The shareholder and contracting partner, if a natural person, is required to provide a written statement included in **Annex 5** (Statement of a Politically Exposed Person) by way of physical presence, as to whether he is considered politically exposed or a close relative of a politically exposed person, or a person known to be a close associate of a politically exposed person. If so, the statement must also indicate the specific provision of law under which he is considered a politically exposed person. Furthermore, the statement must also indicate information on the source of funds and assets.

Measures shall be taken to examine the statement submitted, in records and registers which are available for such purpose under the relevant legislation or which are made publicly available.

In case of politically exposed persons, business relationships shall be established and transactions shall be completed only upon the approval of the director of **FuturAqua Plc.**

The monitoring of business relationship established with politically exposed persons shall be conducted in strengthened procedure.

The statement of the shareholder and contracting partner may be omitted, if the service provider recorded the data based on the documents presented and on publicly-accessible records and registers, or other similar registers the operators of which are required by law to supply information to **FuturAqua Plc.** In this case it shall also be indicated that the data had been recorded in the absence of the customer's statement.

#### **V.4.1 Due diligence of politically exposed persons**

The shareholder and contracting partner, if a natural person, is required to provide a written statement included in **Annex 5** (Statement of a Politically Exposed Persons) by way of physical presence, as to whether he is considered politically exposed. If so, the statement must also indicate the specific provision of law under which he is considered so. Furthermore, the statement must also indicate information as to the source of funds. Measures shall be taken to examine the statement submitted, in records and registers which are available for such purpose under the relevant legislation or which are made publicly available.

**FuturAqua Plc.** verifies these data based on public registers with unlimited access. In case of politically exposed persons, business relationships shall be established and transactions shall be completed only upon the approval of any member of the board of **FuturAqua Plc.**

The monitoring of business relationship established with politically exposed persons shall be conducted in strengthened procedure.

The statement of the shareholder and the contracting partner may be omitted, if the service provider recorded the data based on the documents presented and on publicly-accessible records and registers, or other similar registers the operators of which are required by law to supply information to **FuturAqua Plc.** In this case, it shall also be indicated that the data had been recorded in the absence of the customer's statement.

**FuturAqua Plc.** verifies these data based on public registers with unlimited access.

#### **V.5. Internal risk assessment**

Based on the nature of the activities of the Public Limited Company, the money laundering risk is extremely low, transfers of funds always end with transfers of funds to the account of natural persons, legal entities and unincorporated organisations in connection with whom the due diligence were conducted multiple times.

In cases considered to be of high risk based on customer risk factors (Annex 8), the establishment of the business relationship and the completion of the transaction shall be approved by the person appointed.

The risk assessment is ongoing, in the course of his analysing activities the responsible person records the newly occurred risks and takes the necessary measures (checks the shareholder practice during its membership, the shareholder habits during the existing relationship, the available background information of the shareholder and based on these considers the necessity of reporting). The assessment, analysis, documentation and classification of risks are the responsibility of the person appointed.

### **VI. REPORTING OBLIGATION**

The employees shall report without delay to the person appointed (Annex 6 Report on information, fact or circumstance giving rise to a suspicion of money laundering and terrorist financing) any information, fact or circumstance giving rise to a suspicion

- of money laundering,
- of terrorist financing, or
- that specific property is derived from criminal activity.

The completion of the identification data/datasheet, the reporting datasheet and their delivery to the person appointed are the responsibilities of the employee who was conducting the specific transaction. In case the employee considers the transaction unusual based on the criteria described later or for any other reason, he shall send the completed reporting datasheet to the person responsible for reporting. The employee shall notify his supervisor about the reporting, to whom the same confidentiality rules shall continue to apply as to the other participants of the reporting process. The employee shall keep the fact of reporting confidential before the shareholder contracting partner (prohibition of disclosure).

In case of suspicion of money laundering, the "Report on circumstance giving rise to a suspicion of money laundering" form shall be completed and sent electronically to the person appointed. The person appointed shall send the information, data and the circumstances of the transaction to the National Tax and Customs Authority in the form of a secure electronic message.

The report shall always contain the data recorded during the customer due diligence, therefore the data of the shareholder, contracting partner and the beneficial owner, in case of business relationship the type and subject of the contract and the term of the legal relationship, in case of transaction the subject and amount of the transaction and its potential place, date and way of performance, the presentation of data referring to money laundering or terrorism, the description of the circumstances and the source of the sum serving as the basis of the transaction.

During the review of the report, the person appointed may, if necessary, request the necessary documents from the contact person, who shall hand over the data within 2 (two) weeks following the date of the request.

**Futuraqua Plc.** is required to keep the data and documents obtained during the due diligence (e.g. certified copy of the document) and the copies thereof, and the documents evidencing compliance with reporting and the copies thereof, for a period of 8 (eight) years after the date of recording of the data, the reporting or the suspension, and the documents and data obtained during the identification when entering into the contractual relationship, and their copies, for a period of 8 (eight) years after the end of the business relationship.

The report shall be examined for transactions already carried out or pending, including transactions initiated by the shareholder or contracting partner but not yet executed, and where the implementation of due diligence measures of the shareholder or contracting partner has failed.

The transaction cannot be executed until the report is forwarded to the FIU. Where refraining from carrying out the transaction is impossible or filing the report before the transaction is executed is likely to frustrate efforts to pursue the beneficiary, the person appointed shall dispatch the report after carrying out the transaction.

#### *VI.1. Content of the report and the relating rules*

- data of **Futuraqua Plc.**, name, business address and telephone number of the person appointed,
- identification data of the shareholder and contracting partner,
- description of the information, fact or circumstance relevant for reporting,
- measures done by **Futuraqua Plc.**,
- the date of the report.

The report shall be accompanied by the documents establishing proof of existence of the data, fact or circumstance giving rise to a suspicion of money laundering or terrorist financing. The notifying employee is responsible for completing the report datasheet and sending it to the designated person. The reports must be made to the FIU, the contact details of which are set out in this Regulation (Annex 6/2: Contact details of the FIU). The FIU may request to supplements the data, fact or circumstance giving rise to money laundering or terrorist financing, which request shall be executed.

#### *VI.1.1. Suspension of transactions*

The transaction is suspended to ensure that the FIU may take immediate measures in case of the occurrence of a transaction related to data, fact or circumstance giving rise to money laundering or terrorist financing.

The person appointed, by informing the appointed managing director, informs the manager of the concerned organisational unit about the suspension. Since the information provided to the customer according to the Act on Money Laundering shall not refer to the suspension and its reason, the communication with the customer shall only be conducted with the approval of the person appointed (occurrence of technical issue with justification).

The person appointed informs the authority operating as the financial intelligence unit by phone about the fact of the suspension and acts on the basis of instructions received from the authority (during the entire term of the suspension). The person appointed shall handle and store the report and its documentation made in the course of the suspension separate from the other reports.

The suspension of the transaction may be executed by the suspension of all other transactions with respect to the services provided to the shareholder and contracting partner involving transactions to the debit of the assets of the shareholder and contracting partner. In that case, the attention of the FIU should be drawn to this in the report.

The suspended transaction shall be carried out based on the notification of the FIU if the transaction can be carried out within the suspension period or if 4 working days elapsed following the suspension and in the absence of a notice from the FIU.

The completion of the transactions shall be suspended in case the FIU sends a written notification in connection with the transaction or on any data, fact or circumstance relevant for reporting related to the customer.

The FIU is entitled to extend the period of the investigation once by an additional 3 working days, in this case it informs FuturAqua Plc.

The FIU shall inform in writing within 4 working days:

- a) concerning the extension of the investigation;
- b) if the transaction can be carried out before the investigation of the FIU is completed.

### VI.1.2. Exemption

The reporting person and FuturAqua Plc., if acting in good faith, shall not invoke civil or criminal liability even in circumstances where the report ultimately proves to be unfounded or the suspended transaction may subsequently be carried out. The disclosure of information shall not constitute a breach of any restriction on disclosure of information imposed by legislative provision or by contract.

### VI.2. Prohibition of disclosure

No information shall be disclosed to the service provider, the contracting partner and other third persons

- on the fact that a report has been filed, and on its content,
- the fact that the transaction has been suspended,
- the name of the reporting person,
- or whether any investigation is being carried out on the customer.

It shall be ensured that the filing of the report, the contents thereof and the identity of the person filing the report remain confidential. The prohibition shall not include disclosure to the MNB by the reporting person, including the transmission of information made by the request of the FIU if it requests information in order to carry out its task as defined by the law.

## **VII. INTERNAL CONTROL AND INFORMATION SYSTEMS, TRAINING PROGRAMS**

Due to its activity / service structure, **FuturAqua Plc.** has a minimal risk of money laundering

The person appointed examines the possible risk of money laundering each time if the total value of the purchased shares (cumulative amount) is HUF 10,000,000 per year (i.e. the amount of HUF 10 million or more).

**FuturAqua Plc.** ensures that its own internal system, which contains the data and share turnover of all shareholders, is able to sort the business relationship based on personal data, account number at the time of the payment, customer number, transaction type or amount limit.

FuturAqua Plc. ensures that the case management system is able to register in a documented traceable manner during the period defined in the Act on Money Laundering the data registered therein (ensuring data quality and archiving).

### **VII.1 Operation of the system (authorisation, obligation and responsibility)**

The parametrisation of the system is the responsibility of the person or organisational unit appointed by the management of FuturAqua Plc. for this task, who performs parametrisation with adequate frequency.

In order for FuturAqua Plc. to complete with full effect and within deadline the enquiries received from the FIU, the MNB or the bodies of law enforcement, the person appointed for the task receives, files, processes and answers the requests. He records the incoming enquiries in a table and weighs them in order to have available the deadline of 8, 15 or the average 30 days for answering. Where appropriate (in case of contracts or other documents not available electronically), immediately contacts the concerned organisational unit in order to obtain the requested documents.

In case the information requested in the enquiry is completely available, he responds to the authority in writing (and sends the requested background information and documents). The person appointed for the task records also the exact time of the receipt of the enquiry and the response sent in order to subsequently track back the compliance with the deadline.

## VII.2. Whistleblowing system

**FuturAqua Plc.** operates a whistleblowing system ensuring anonymity as established in its internal regulation (hereinafter referred to as the “reporting system”).

The disclosure shall be investigated by **FuturAqua Plc.** within thirty days. The deadline does not include the date of report. (The person who made the report and the person concerned by the disclosure may not take part in the investigation of the report.)

If **FuturAqua Plc.** finds that data, fact or circumstance give rise to a suspicion of money laundering, terrorist financing, or of that specific property is derived from criminal activity, the responsible person shall report it immediately to the Financial Intelligence Unit.

If **FuturAqua Plc.** establishes that there is a suspicion of a criminal offence, it shall immediately report it to the investigating authority vested with competence and jurisdiction.

If **FuturAqua Plc.** establishes the infringement of the provisions of the Act on Money Laundering and the Act on the Implementation of Financial and Proprietary Restrictive Measures ordered by the European Union and the UN Security Council or of this Decree, the responsible person shall immediately notify it to the MNB.

After the report is made, **FuturAqua Plc.** shall ensure that no person other than the person involved in the report or its investigation has access to it.

The person appointed of **FuturAqua Plc.** is an employee of **FuturAqua Plc.**

**FuturAqua Plc.** shall immediately notify the FIU in writing of the contact details of the person appointed or of any change in the **person appointed**.

**FuturAqua Plc.** notifies the employees of **FuturAqua Plc.** by email about the name and contact details of the person appointed.

The person appointed may also carry out the tasks provided for in the Act on Money Laundering and Act on Restrictions, however, a different person may only be entrusted with the tasks specified by the Acts.

### Obligations of the person appointed

- availability to the person making the report, for professional consultancy,
- checking the content and form of the received reports and then sending them immediately to the FIU electronically as a protected file, using the form sent through the General Software for filling out forms (the Hungarian abbreviation: ÁNYK) with the help of the ÁNYK filling program that can be sent (Annex 6) - through the Customer Portal,
- making available the data relating to the contact person initiating the report to the FIU or the body responsible for ordering the restrictive measures on liquid assets and other financial interests, if it was specifically requested by the FIU or the body responsible for ordering the restrictive measures on liquid assets and other financial interests,
- design, operation and improvement of the filter monitoring system,
- organising education and training for the contact persons regularly but at least once a year, transferring the current experience,
- contact with the units designated by the FIU in case of the relevant inquiries, provision of information on the transactions, customers and the contractual relations and transactions not included in the report (the request shall comply with the provisions of other legislation, thus the requirements of the CIFE and Act XXXIV of 2014 on the Hungarian National Police and Act XC of 2017 on Criminal Procedure),
- providing information to the Board of Directors of **FuturAqua Plc.** to provide the Board of Directors with information on the number of report and experience at least once a year,
- secure storage of reports in accordance with the confidentiality requirements,
- developing the purpose, task, procedure and rules of the activity related to the prevention and deterrence of money laundering and terrorist financing, and to the implementation of restrictive measures on liquid assets and other financial interests,
- regular, at least annual inspections of compliance with the rules on money laundering, the prevention and deterrence of the financing of terrorism and proliferation, and the implementation of restrictive measures on liquid assets and other financial interests, including shareholder and contracting partner due diligence, education and



screening,

- informing the Board of Directors of **FuturAqua Plc.** about the findings of the investigations.

Rights of the person appointed:

- the right of access to data necessary for the conduct of investigation relating to the inspections of compliance with the rules on money laundering, the prevention and deterrence of the financing of terrorism and proliferation, and the implementation of restrictive measures on liquid assets and other financial interests,
- unrestricted access to the file of the transaction, Shareholder, contracting partner and the related customers involved in the report sent to them,
- requesting information on the future of the report from the receiving authority,
- requesting the notifying employee to complete the report.

The internal control procedure

Responsibilities:

- regular monitoring of compliance with anti-money laundering rules and the fight against terrorism, in particular of the shareholder and contracting partner due diligence process and the examination of reports and the activities of central units, agents and the person appointed.
- informing the Monitoring Committee and the Board of Directors of the findings of the investigations.

Rights:

- the right of access to data in money laundering investigations.

## **2. PART: PROVISIONS ACCORDING TO THE ACT ON RESTRICTIONS**

### **IX. PURPOSE OF IMPOSING RESTRICTIVE MEASURES ON LIQUID ASSETS AND OTHER FINANCIAL INTERESTS IMPOSED BY THE EUROPEAN UNION**

The purpose of the Act on Restrictions is to freeze the economic and financial resources of the subject of the restrictive measures

- on liquid assets and other financial interests,
- and prohibition on making them available.

The restrictive measures on liquid assets and other financial interests provided for in the Act on Restrictions are to implement the measures on liquid assets and other financial interests imposed by the European Union in a Community regulation and by the resolution of the UN Security Council.

### **X. IMPLEMENTATION OF THE RESTRICTIVE MEASURES ON LIQUID ASSETS AND OTHER FINANCIAL INTERESTS**

**FuturAqua Plc.** continuously monitors the publication and the subsequent amendments of the legal acts of the European Union and UN SC resolutions imposing restrictive measures on liquid assets and other financial interests. In order to implement the tasks under this Regulation, the MNB publishes information on the legal acts of the Union imposing restrictive measures and on the resolutions of UN SC on its website and keeps it up to date.

#### **X.1. Due diligence and monitoring system**

When establishing a business relationship and in case of changes in the sanction lists, it shall be checked whether the shareholder and the contracting partner is on one of the sanction lists. When establishing the customer relationship, the contact person checks the shareholder and the contracting partner on the lists.

If **FuturAqua Plc.** carries out the verification itself, the contact person shall document that it has taken place. The result of the verification, indicating also the date of the inspection, shall be kept in electronic form or on paper for 8 years after the screening, during which time the result of the inspection shall be continuously verifiable electronically or on paper. In the event of a negative hit, the customer relationship may be established, and in the event of a positive hit, the customer relationship is only possible after the person appointed has been notified and following his actions.

If the person appointed can conclude without any doubt that only a name match has taken place, he shall immediately notify the contact person to continue the transaction. If the person appointed cannot conclude without any doubt that the information on the list and the verified customer is one and the same person, he shall notify the FIU.

The contact details of the lists (UN and EU) relevant and necessary for the prevention and deterrence of terrorist financing are set out in Annex 6 of this Regulation.

## **X.2. Reporting obligations on the basis of the Act on Restrictions**

In the case of data, fact or circumstance giving rise to money laundering or terrorist financing, the manager or employee of **FuturAqua Plc.** shall immediately notify the person appointed by **FuturAqua Plc.**

The measures to be applied during the report are determined by **FuturAqua Plc.** in the internal rules of procedure. Within this framework, it regulates the part of the tasks and procedural competencies of the employees, the course of the procedure, the person appointed, the method of certifying that the report has been made and the method of registering the report.

The report shall include information on the data, fact or circumstance indicating money laundering or terrorist financing and the documents establishing proof of existence of the data, fact or circumstance indicating money laundering or terrorist financing, if they are available.

The mandatory content of the report:

- the name and data of the notifier, the name, business address and telephone number of the person appointed;
- the date of the report;
- description of data, facts and circumstances referring to money laundering and terrorist financing.

The report shall be transmitted by the person appointed in the form of a protected electronic message, taking into account the confidentiality provisions of the relevant legislation to the FIU using the form in Annex 7.

The FIU shall examine the report within 4 working days of its submission and, on the basis of its investigation, either initiate the freezing of assets and notify **FuturAqua Plc.** thereof, or notify the company that the conditions for initiating the freezing of assets do not exist. The report form is included in Annex 8.

## **X.3. Asset freezing**

If, as a result of the information officially known by, or of the investigation carried out on the basis of the report, the authority finds that the subject of the restrictive measures on liquid assets and other financial interests has assets to be frozen in Hungary, it shall notify the notifying **FuturAqua Plc.** by sending the report of the examination immediately after the end of the examination. It will also notify **FuturAqua Plc.** if the conditions for freezing are not met.

Within 4 working days after the report, the transaction cannot be completed that may affect the assets subject to restrictive measures on liquid assets and other financial interests on the basis of the data, fact and circumstances on which the report is based, unless the authority notifies that the conditions for freezing are not met.

The transaction must be executed on the 5th working day following the report, unless other conditions for its performance are met, unless the authority informs of the freezing procedure.

The execution of the foreclosure shall be ordered against the subject of the restrictive measures on liquid assets and other financial interests with regard to the assets to be frozen falling within the scope of the restrictive measures on liquid assets and other financial interests.

If, despite the prohibition on the provision of the assets laid down in a legal act of the Union or a UN SC resolution, assets would be made available to the subject of the restrictive measures on liquid assets and other financial interests, a decision shall be made on its implementation and the authority shall be immediately notified thereof.

The report shall include the following information:

Data of the natural person subject to the restrictive measures relating to liquid assets and other financial interests:

- family name and first name,
- name at birth and first name,
- nationality,
- place and date of birth:
- mother's maiden name:
- address and place of residence in the absence of,
- type and number of the official document suitable for identification purposes.

Restrictive measures relating to liquid assets and other financial interests for a person subject to a legal person or an unincorporated organisation:

- name, abbreviated name,
- registered office, or the address of the Hungarian branch of foreign companies, if applicable,
- name and position of authorised representatives,
- data identifying the agent for service of process,
- the registered number of legal persons listed in the companies register, or the number of the resolution adopted on the foundation (registration, admission into the register) of other legal persons, or their register number;

and:

- other data published by a legal act of the European Union and the resolution of the UN Security Council relating to restrictive measures on liquid assets and other financial interests,
- the data of the natural person, legal entity or unincorporated organisation specified in Point a) with a right to restrict the implementation of the restrictive measures relating to liquid assets and other financial interests under the scope of the restrictive measures relating to liquid assets and other financial interests;

and:

- an indication of the relevant provision of the applied legal act of the European Union or the decision of the UN Security Council,
- the identification data, which is available and defined by law appropriate to its organisational form, of the legal entity or unincorporated organisation with a right to restrict the implementation of the restrictive measures relating to liquid assets and other financial interests,
- data necessary and available to identify the wealth.

## **XI. PERSON APPOINTED**

The description of rights and obligations is the same as described in Point VIII.

### **3. PART: COMMON PROVISIONS OF THE ACT ON MONEY LAUNDERING AND ACT ON RESTRICTIONS**

## **XII. RIGHTS AND OBLIGATIONS OF THE CONTACT PERSON DIRECTLY RELATED TO THE CUSTOMER**

Obligations of the account managers having a direct contact with the shareholder or contracting partner:

- compliance with due diligence measures, including the recording of identification data during the identification of the shareholder and the contracting partner,
- filling in a report datasheet in the case of a data, fact or circumstance giving rise to money laundering, terrorist or proliferation financing,
- filling in the report datasheet in case of existence of funds or economic resources subject to the restrictive measures relating to liquid assets and other financial interests,

- a detailed and precise description of the data, fact, circumstance indicating money laundering, financing of terrorism or proliferation, or the existence of funds or economic resources subject to restrictive measures relating to liquid assets and other financial interests in the report,
- attachment of the documents supporting the detailed description of the data, fact, circumstance indicating money laundering, financing of terrorism or proliferation, or the existence of funds or economic resources subject to restrictive measures relating to liquid assets and other financial interests for the report,
- immediate transmission of the completed report datasheet to the responsible person,
- keeping the report or the investigation secret from the shareholder and the contracting partner,
- report even in the case of a suspicious transaction that has not taken place,
- the transaction shall not be carried out until the report is dispatched,
- participation in the related training program.

Rights of the account managers having a direct contact with the shareholder or contracting partner:

- right to anonymity, as reports should not include the name of the notifying account manager, a measure that further enhances the notifier's favourable position beyond the confidentiality of reports,
- exemption from the obligation to maintain fund secrets when initiating the report whether it has been found to be justified,
- possibility of professional consultation with the person appointed.

Consequences of breach of obligations:

The managers and employees of **FuturAqua Plc.** shall be liable to disciplinary action or criminally liable if, due to their intentional or negligent conduct, they fail to comply with their previously specified identification or reporting obligations.

The disciplinary or criminal liability can be established if:

- the employee fails to fulfil its identification obligation, - fails to report a transaction that complies with the unusual transaction descriptions.

If an employee of the company contributes to money laundering, the Act as aggravated case enables a more severe penalty to be imposed.

It is not punishable for money laundering who voluntarily reports or initiates a report to the authority, provided that the action has not yet been discovered or is only partially discovered.

### **XIII. DATA PROTECTION, REGISTER**

Data shall be recorded in a documented traceable manner:

- personal data collected during shareholder or contracting partner due diligence (including data obtained during electronic identification), including information on the source of funds and source of wealth,
- and on non-personal data,
- on the document and the copy of the document,
- on the report,
- on the documents of the suspended transaction,
- on the measures taken at the request of the FIU,
- on requests by the authorities, public prosecutors or the courts and on compliance with data disclosure requirements on the basis thereof.

The data, documents and their copies

- on data recording during the recording thereon,
- a document certifying the execution of the report and the suspension of the execution of the transaction order, and the copy thereof,
- all other documents created in connection with the business relationship and a copy

thereof shall be kept for 8 years following the report or suspension.

Within the register, the document certifying the suspension of the transaction or a copy thereof, and the documents of the disclosure shall be handled separately.

In the register, the records of all cash transaction orders in the amount of HUF four million five hundred thousand or more (whether in Forints or in any other currency) shall be kept for a period of 8 years.

The retention period of the data and documents, including their copies, known at the time of establishing the business relationship shall start after the end of the business relationship.

Personal data obtained in the course of fulfilling the shareholder or contracting partner due diligence obligation shall be disclosed and processed only for the purposes of the tasks to be performed in order to prevent and combat money laundering and terrorist financing, to the extent necessary for the performance thereof.

The data, document and a copy of the document in its register shall be kept upon request by

- the MNB
- the FIU,
- and the investigating authority, the public prosecutor's office or the court

for the period specified in the request, not exceeding 10 years. **FuturAqua Plc.** shall fulfil the request immediately, but no later than by the deadline specified in the request.

This possible only if the data, document and copy thereof specified in the request is necessary for an ongoing procedure or for a procedure to be launched in the future.

The above data and documents, including their copies, shall be deleted or destroyed immediately upon the expiry of the retention period.

The data, document and the copy of the document shall immediately be deleted after the notification on the final conclusion of the procedure of the requesting authorities, the public prosecutors or the courts or if the procedure contemplated did not materialize. The specific body immediately informs **FuturAqua Plc.** on the final conclusion of the procedure or if the procedure contemplated did not materialize.

In the event of changes in data, the old data shall be kept to clearly establish the old data that are no longer in force and the dates of the data changes.

Paper-based data, documents and copies thereof may also be retained on a paper basis in printed form, but paper-based data, documents and copies thereof may also be retained in electronic form (such as a PDF file). Electronically created data, documents and their copies (which exist in electronic format at the time of their creation (e.g. file)) are, as a general rule, stored electronically, but their storage is also acceptable on a (printed) paper basis.

## FINAL PROVISIONS

In respect of matters not covered by this Regulation, the provisions of the applicable legislation in force shall apply, in accordance with the Articles of Association and other regulations of **FuturAqua Plc.**

This amendment of the Money Laundering Regulation was adopted by the Board of Directors of FuturAqua Public Limited Company on ... April 2020 by a written vote.

Zsolt András Hajnal  
Chairman of the Governing Board





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**a.f. Annex 2 - BENEFICIAL OWNERSHIP STATEMENT OF THE CUSTOMER  
TO BE COMPLETED ONLY BY THE NATURAL PERSON CUSTOMER to fulfil the obligation set out in  
Section 8 of the Act on Money Laundering**

In the event of a business relationship:

The undersigned ..... I hereby declare that I act as a natural person on behalf of the following person(s)\*:

In the event of a transaction order:

The undersigned ..... (as authorised representative of ..... ) I hereby declare that I act on behalf of the following person(s)\*:

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| 8. | Yes: |  |  |    |  | No: |  |  |  |   | 8. | Yes: |  |  |    |  | No: |  |  |   |  |
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| 8. | Yes: |  |  |    |  | No: |  |  |  |   | 8. | Yes: |  |  |    |  | No: |  |  |   |  |
| 9. |      |  |  | 10 |  |     |  |  |  | % | 9. |      |  |  | 10 |  |     |  |  | % |  |

- 1. Family name and first name
- 2. Name at birth and first name
- 3. Address or place of residence in the absence thereof
- 4: Nationality:
- 5. Hungarian – mark with an X and do not fill in field 6.
- 6. Other (in case of a customer who is not a Hungarian citizen, please provide the nationality):
- 7. Place and date of birth
- 8. Whether the beneficial owner qualifies as politically exposed person – mark with an X (if so, please fill in the declaration of the politically exposed persons relating to the beneficial owner)
- 9. *Nature of ownership interest\*\**
- 10. *Extent of ownership interest\*\**

**I am aware that within 5 (five) working days I shall notify the service provider of any changes in the above data or in my personal data and the damage resulting from the failure to comply with this obligation shall be borne by me.**

Date: ....., ..... day ..... month ..... year  
.....

Signature of Customer

\* The appropriate part should be underlined or deleted.  
\*\* Please fill in only if you are acting on behalf of the legal entity in the case of an authorised transaction order.

Beneficial owner shall mean:

- a) any natural person who owns or controls at least twenty-five per cent of the shares or voting rights in a legal person or an unincorporated organisation directly or, by way of the means defined in Subsection (4) of Section 8:2 of the Civil Code, indirectly, or who is able to exercise effective control over the legal person or unincorporated organisation via other means, if that legal person or unincorporated organisation is not listed on a regulated market and is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards.
- b) any natural person who has a dominant influence in a legal person or unincorporated business association as defined in Subsection (2) of Section 8:2 of the Civil Code,
- c) any natural person on whose behalf a transaction is being conducted, or who is able to exercise effective control over the activity of a customer via other means in the case of natural persons,
- d) in the case of foundations:
  - i. where the future beneficiaries have already been determined, the natural person who is the beneficiary of twenty-five per cent or more of the property of the foundation,
  - ii. where the individuals that benefit from the foundation have yet to be determined, the natural person in whose main interest the foundation is set up or operates,
  - iii. the natural person who exercises control in the management of the foundation or exercises control over at least twenty-five per cent of the property of the foundation, or
  - iv. in the absence of a natural person provided for in Subparagraphs i-iii., the person who is authorised to represent the foundation,
- e) in the case of fiduciary asset management contracts the following persons:
  - i. the principal(s) if the principal is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
  - ii. the fiduciary(ies) if the fiduciary is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
  - iii. the beneficiaries or class of beneficiaries if the beneficiary is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
  - iv. any natural person exercising effective control over the trust fund via other means, and
  - v. the protector(s), if any - if the protector is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof; furthermore
- f) in the absence of the natural person referred to in Paragraphs a) and b), the executive officer of the legal person or unincorporated business association.

**Annex 3 - BENEFICIAL OWNERSHIP STATEMENT OF THE CUSTOMER  
TO BE COMPLETED BY THE LEGAL PERSONS OR  
THE UNINCORPORATED ORGANISATION CUSTOMER - to fulfil the obligation set out in  
Section 9 of the Act on Money Laundering**

The undersigned ....., (as the representative of) ..... I hereby declare that the beneficial owner(s) of the legal person or unincorporated organisation whom I represent is/are the following person(s):

|     |    |     |    |
|-----|----|-----|----|
| 1.  |    | 1.  |    |
| 2.  |    | 2.  |    |
| 3.  |    | 3.  |    |
| 4.  | 5. | 4.  | 5. |
| .   | 6. | .   | 6. |
| 7.  |    | 7.  |    |
| 8.  | 9. | 8.  | 9. |
| .   | %  | .   | %  |
| 10. |    | 10. |    |
| 1.  |    | 1.  |    |
| 2.  |    | 2.  |    |
| 3.  |    | 3.  |    |
| 4.  | 5. | 4.  | 5. |
| .   | 6. | .   | 6. |
| 7.  |    | 7.  |    |
| 8.  | 9. | 8.  | 9. |
| .   | %  | .   | %  |
| 10. |    | 10. |    |

1. Family name and first name
2. Name at birth and first name
3. Address or place of residence in the absence thereof
4. Nationality:
5. Hungarian – mark with an X and do not fill in field 6.
6. Other (in case of a customer who is not a Hungarian citizen, please provide the nationality):
7. Place and date of birth
8. Nature of ownership interest
9. Extent of ownership interest
10. Whether the beneficial owner qualifies as politically exposed person – mark with an X.

I am aware that within 5 (five) working days I shall notify the service provider of any changes in the above data or in my personal data and the damage resulting from the failure to comply with this obligation shall be borne by me.

Date: ....., .....day ..... month ..... year

.....

Signature of Customer

Beneficial owner:

- a) any natural person who owns or controls at least twenty-five per cent of the shares or voting rights in a legal person or an unincorporated organisation directly or, by way of the means defined in Subsection (4) of Section 8:2 of the Civil Code, indirectly, or who is able to exercise effective control over the legal person or unincorporated organisation via other means, if that legal person or unincorporated organisation is not listed on a regulated market and is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards.
- b) any natural person who has a dominant influence in a legal person or unincorporated business association as defined in Subsection (2) of Section 8:2 of the Civil Code,

- c) any natural person on whose behalf a transaction is being conducted, or who is able to exercise effective control over the activity of a customer via other means in the case of natural persons,
- d) in the case of foundations:
  - i. where the future beneficiaries have already been determined, the natural person who is the beneficiary of twenty-five per cent or more of the property of the foundation,
  - ii. where the individuals that benefit from the foundation have yet to be determined, the natural person in whose main interest the foundation is set up or operates,
  - iii. the natural person who exercises control in the management of the foundation or exercises control over at least twenty-five per cent of the property of the foundation, or
  - iv. in the absence of a natural person provided for in Subparagraphs i-iii., the person who is authorized to represent the foundation,
- e) in the case of fiduciary asset management, contracts the following persons:
  - i. the principal(s) - if the principal is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
  - ii. the fiduciary(ies) - if the fiduciary is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
  - iii. the beneficiaries or class of beneficiaries - if the beneficiary is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof,
  - iv. any natural person exercising effective control over the trust fund via other means, and
  - v. the protector(s), if any - if the protector is an entity other than natural person, the beneficial owner referred to in Paragraph a) or b) thereof; furthermore
- f) in the absence of the natural person referred to in Paragraphs a) and b), the executive officer of the legal person or unincorporated business association;
- h) The customer's representative shall indicate all natural persons who comply with the above points as beneficial owners (in the absence of all relevant points and Point a) and b), all executive officers).



**Annex 4 - DECLARATION OF POLITIALLY EXPOSED PERSON OF THE BENEFICIAL OWNERS - TO BE COMPLETED BY THE CUSTOMER! \* - to fulfil the obligation set out in Section 9 of the Act on Money Laundering**

**In the case of a legal person or an unincorporated organisation customer:**

The undersigned ..... (as the representative of ..... ) I hereby declare that the beneficial owner(s) of the legal person or unincorporated organisation under the name of ..... whom I represent is/are the following person(s):

**In the case of a natural person customer:**

The undersigned ..... hereby declare that beneficial owner under the name of .....

|                                                                                                                                                                                              |                               |                              |       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------|-------|
| A: I am a politically exposed person (indicate the code of category according to Point A)                                                                                                    | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> | code: |
| B: I am a close relative of a politically exposed person<br>Family name and first name of the politically exposed person:<br>.....<br>date of birth of the politically exposed person:       | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> | -     |
| C: I am a person known to be a close associate of a politically exposed person<br>Family name of the politically exposed person:<br>.....<br>Date:<br>First name by birth of the politically | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> | -     |

**Politically exposed person:** a natural person who is entrusted with prominent public functions, or who has been entrusted with prominent public functions within at least one year before the implementation of customer due diligence measures<sup>1</sup>.

A) Natural person who has been entrusted with prominent public functions shall include:

|    |                                                                                                                                                                                                                                                                                                      |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) | heads of State, heads of government, ministers and deputy ministers, state secretaries, in Hungary the head of State, the Prime Minister, ministers and state secretaries;                                                                                                                           |
| b) | members of parliament or of similar legislative bodies, in Hungary members of parliament and spokesmen for the nationality;                                                                                                                                                                          |
| c) | members of the governing bodies of political parties, in Hungary members and officers of the governing bodies of political parties;                                                                                                                                                                  |
| d) | members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, in Hungary members of the Constitutional Court, of the courts of appeal and the Curia;                                                         |
| e) | members of courts of auditors or of the boards of central banks, in Hungary the President and Vice-President of the State Audit Office, members of the Monetary Council and the Financial Stability Board;                                                                                           |
| f) | ambassadors, chargés d'affaires and high-ranking officers in the armed forces, in Hungary the head of the central body of law enforcement bodies and organisations and his deputy, Chief of Staff of the Hungarian Army and Deputy Chiefs of Staff of the Hungarian Army;                            |
| g) | members of the administrative, management or supervisory bodies of enterprises with majority state ownership, in Hungary the managing directors of enterprises with majority state ownership, including members of the management body exercising control or supervisory rights of such enterprises; |
| h) | directors, deputy directors and members of the board or equivalent function of an international organisation, or any other person performing equivalent duties.                                                                                                                                      |

B) I am a close relative of a politically exposed person

|    |        |
|----|--------|
| a) | spouse |
|----|--------|

|        |                                                                   |
|--------|-------------------------------------------------------------------|
| b<br>) | domestic partner                                                  |
| c)     | biological and adopted children, stepchildren and foster children |
| d<br>) | their spouse or domestic partner                                  |
| e)     | the biological, adoptive, step- and foster parents                |

C) Person known to be a close associate of a politically exposed person

|    |                                                                                                                                                                                           |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) | any natural person who is known to have joint beneficial ownership of legal entities or unincorporated organisations, or any other close business relations,                              |
| b) | any natural person who has sole beneficial ownership of a legal entity or unincorporated organisation which is known to have been set up for the benefit of a politically exposed person. |

Date: ....., .....day.....month..... year

.....  
Signature

<sup>1</sup> A Szolgáltató kockázaterzékenységi alapon az egy éves időtartamnál hosszabb időtartamot is meghatározhat.

**Annex 5 - STATEMENT OF A POLITICALLY EXPOSED PERSON TO BE COMPLETED ONLY BY THE NATURAL PERSON CUSTOMER - to fulfil the obligation set out in Section 9/A of the Act on Money Laundering**

|                                                                                                                                                                                           |                                                            |       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|-------|
| A: I am a politically exposed person (indicate the code of category according to Point A)                                                                                                 | Yes: <input type="checkbox"/> No: <input type="checkbox"/> | code: |
| B: I am a close relative of a politically exposed person<br>Family name and first name of the politically exposed person:<br>.....<br>date of birth of the politically exposed person:    | Yes: <input type="checkbox"/> No: <input type="checkbox"/> | -     |
| C: I am a person known to be a close associate of a politically exposed person<br>Family name of the politically exposed person: .....<br>Date:<br>First name by birth of the politically | Yes: <input type="checkbox"/> No: <input type="checkbox"/> | -     |

Politically exposed person: a natural person who is entrusted with prominent public functions, or who has been entrusted with prominent public functions within at least one year before the implementation of customer due diligence measures<sup>2</sup>.

A) Natural person who has been entrusted with prominent public functions shall include:

|    |                                                                                                                                                                                                                                                                                                      |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) | heads of State, heads of government, ministers and deputy ministers, state secretaries, in Hungary the head of State, the Prime Minister, ministers and state secretaries;                                                                                                                           |
| b) | members of parliament or of similar legislative bodies, in Hungary members of parliament and spokesmen for the nationality;                                                                                                                                                                          |
| c) | members of the governing bodies of political parties, in Hungary members and officers of the governing bodies of political parties;                                                                                                                                                                  |
| d) | members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, in Hungary members of the Constitutional Court, of the courts of appeal and the Curia;                                                         |
| e) | members of courts of auditors or of the boards of central banks, in Hungary the President and Vice-President of the State Audit Office, members of the Monetary Council and the Financial Stability Board;                                                                                           |
| f) | ambassadors, chargés d'affaires and high-ranking officers in the armed forces, in Hungary the head of the central body of law enforcement bodies and organisations and his deputy, Chief of Staff of the Hungarian Army and Deputy Chiefs of Staff of the Hungarian Army;                            |
| g) | members of the administrative, management or supervisory bodies of enterprises with majority state ownership, in Hungary the managing directors of enterprises with majority state ownership, including members of the management body exercising control or supervisory rights of such enterprises; |
| h) | directors, deputy directors and members of the board or equivalent function of an international organisation, or any other person performing equivalent duties.                                                                                                                                      |

B) Close relative of a politically exposed person:

|    |                                                                   |
|----|-------------------------------------------------------------------|
| a) | spouse                                                            |
| b) | domestic partner                                                  |
| c) | biological and adopted children, stepchildren and foster children |
| d) | their spouse or domestic partner                                  |
| e) | the biological, adoptive, step- and foster parents                |

C) Person known to be a close associate of a politically exposed person:

|    |                                                                                                                                                              |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) | any natural person who is known to have joint beneficial ownership of legal entities or unincorporated organisations, or any other close business relations, |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------|

|        |                                                                                                                                                                                           |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| b<br>) | any natural person who has sole beneficial ownership of a legal entity or unincorporated organisation which is known to have been set up for the benefit of a politically exposed person. |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                                  |  |
|----------------------------------|--|
| Establishing the source of funds |  |
|----------------------------------|--|

|                                   |  |
|-----------------------------------|--|
| Establishing the source of wealth |  |
|-----------------------------------|--|

Annex: documents requested to verify the establishing the source of funds and/or wealth

Date: ....., .....day.....month..... year

.....  
signature

---

2 A Szolgáltató kockázatérzékenységi alapon az egy éves időtartamnál hosszabb időtartamot is meghatározhat.

**a.a. Annex 6 - Report on information indicating the existence of data, facts or  
circumstances indicating money laundering and terrorist financing  
THIS DOCUMENT IS FOR INTERNAL USE ONLY!**

The report shall be accompanied by the documents establishing proof of existence of the data, fact or circumstance giving rise to a suspicion of money laundering or terrorist financing.

1. Name, address and direct phone number of **FuturAqua Plc.**
  - 1.1. Name and address of the person (unit) detecting the suspicious transaction (if other than referred to in Point 1)
  - 1.2. Date and time of detection
  - 1.3. Reference numbers and dates of the previous reports concerning the same case (customer) (if any):
  - 1.4. Name, business address and telephone number of the designated person
2. Identification data of the customer affected by the report [Section 7-14/A. of the Act on Money Laundering (Regulation Chapter.....)].
  - 2.1. All identifying data is available: Yes / No
  - 2.2. Is there another person involved in the case? If yes, the details of the related and other person(s) [it is required to indicate also the person, if any, to whom the transaction is conducted]
3. Transaction details (including the executed transaction or the transaction to be executed and the transaction initiated but not executed by the customer)
  - 3.1 Description of the transaction (type, total amount by currency, payment, transfer, receipt of amount and cash withdrawal etc.)
  - 3.2 Type(s) and number(s) of customer and beneficiary accounts involved in the transaction, if any
  - 3.3 Any information, fact or circumstance giving rise to a suspicion of money laundering or terrorist financing,
  - 3.4 The documents establishing proof of existence of the data, fact or circumstance giving rise to a suspicion of money laundering or terrorist financing, if available [copy of the customer's contracts concluded with the Service Provider, reference documents and other detailed descriptions, remarks and notes etc.].
4. Any other information, fact or circumstance not described above giving rise to a suspicion of money laundering or terrorist financing
5. Measures done by the service provider.

Date: ....., .....day..... month ..... year

### **Annex 6/1. – Contact details of the FIU:**

Hungarian Financial Intelligence Unit (HFIU),  
National Tax and Customs Administration

Address: 1033 Budapest, Huszti út 42.

Mailbox: 1300 Budapest, Pf: 307

Phone: +36-1/430-9466

Contact service (only for service providers covered by the Act on Money Laundering): +36-30/516-5662 Fax: +36-1/430-9305

Email address: [fiu@nav.gov.hu](mailto:fiu@nav.gov.hu)

Website: <https://www.nav.gov.hu/nav/penzmosas/PTEI>

### **Annex 6/2. – Contact details of lists relevant for the prevention and combating money laundering and terrorist financing and compliance with embargo restrictions**

The European Union sanctions list:

[https://eeas.europa.eu/headquarters/headquarters-homepage/8442/consolidated-list-sanctions\\_en](https://eeas.europa.eu/headquarters/headquarters-homepage/8442/consolidated-list-sanctions_en)

The United Nations sanctions lists:

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

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

The MNB's website on the legal acts of the European Union and UN Security Council resolutions imposing restrictive measures: <https://www.mnb.hu/felugyelet/szabalyozas/penzmosas-ellen/korlatozo-intezkedesek-szankciok/penzugyi-es-vagyoni-korlatozo-intezkedesek>

### **Annex 6/3. - Name, position and contact details of the designated person [The name, phone number and email address are required, all other data are optional]:**

According to the Act on Money Laundering:

Name: -

Position: -

Organisational unit: -

Phone: -

Mobile: -

E-mail address: -

According to the Act on Restrictions [If it is identical to the one based on the Act on Money Laundering, it is enough to indicate it once]:

Name: -

Position: -

Organisational unit: -

Phone: -

Mobile: -

E-mail address: -

**a.a. Annex 7 - Report under restrictive measures relating to liquid assets and other financial interests FOR INTERNAL USE ONLY!**

a.f.3. Name, address and telephone number of the relevant service provider organisation or unit that is requested to notify

a.f.4. Date of detection of the funds and economic resources

a.f.5. Name, position and contact details of the designated person

a.f.6. Identification data of the person subject to the restrictive measures relating to liquid assets and other financial interests

Data of the natural person subject to the restrictive measures relating to liquid assets and other financial interests:

- family name and first name,
- name at birth and first name,
- nationality,
- place and date of birth:
- mother's maiden name:
- address or place of residence in the absence thereof:
- type and number of identification document;

Restrictive measures relating to liquid assets and other financial interests for a person subject to a legal person or an unincorporated organisation:

- name, abbreviated name,
- registered office, or the address of the Hungarian branch of foreign companies, if applicable,
- name and position of authorised representatives,
- data identifying the agent for service of process,
- the registered number of legal persons listed in the companies register, or the number of the resolution adopted on the foundation (registration, admission into the register) of other legal persons, or their register number;

and:

- Other data published by a legal act of the European Union and the decision of the UN Security Council relating to restrictive measures on liquid assets and other financial interests;
- The data of the natural person, legal entity or unincorporated organisation specified in Point a) with a right to restrict the implementation of the restrictive measures relating to liquid assets and other financial interests under the scope of the restrictive measures relating to liquid assets and other financial interests.

and:

- An indication of the relevant provision of the applied legal act of the European Union or the decision of the UN Security Council,
- the available identification data defined by law corresponding to its organisational form, of the legal entity or unincorporated organisation with a right to restrict the implementation of the restrictive measures relating to liquid assets and other financial interests
- Data necessary and available to identify the wealth.

a.f.7. All data, facts and circumstances that indicate that the person subject to the measure relating to liquid assets and other financial interests will gain financial advantage from the specific transaction.

a.f.8. Description of the existence of funds or economic resources subject to the restrictive measures relating to liquid assets and other financial interests

- Value of funds
- Currency of funds
- Methods of placing funds
- Data, subject, other data suitable for identification of economic

Resources Done in ....., .....day ..... month ..... year

a.a. **Annex 8 – The accountable manager (according to Point XVI of this Regulation) THIS DOCUMENT IS FOR INTERNAL USE ONLY!**

**<Abbreviated name> appoint the accountable manager(s): <Name, position, contact details> [The name, phone number and email address are required, all others are optional]:**

According to the Act on Money Laundering:

Name: -  
Position: -  
Organisational unit: -  
Phone: -  
Mobile: -  
E-mail address: -