

## Privredna banka Zagreb's practice with clients dealing with luxury goods

Privredna banka Zagreb (hereinafter referred to as the Bank) as part of the Intesa Sanpaolo Group (hereinafter referred to as the Group), in order to mitigate the risk of violation and circumvention of the restrictive measures of the European Union regarding luxury goods listed in Annex XVIII pursuant to Article 3.h of Regulation (EU) No. 833/2014 and in Annex XXV pursuant to Article 1.ga of Regulation (EC) No. 765/2006, as amended by Regulation (EU) No. 2024/1865, when establishing a business relationship with new clients who are legal entities, collects a signed *Attestation of Compliance with respect to restrictions against Russia and Belarus regarding luxury goods*<sup>1</sup> (hereinafter referred to as the *Attestation of Compliance*).

The client signs the *Attestation of Compliance* on the company's business paper according to the attached form and applies to clients who, within the framework of their business:

- directly or indirectly, sell, supply, transfer or export the luxury goods listed respectively in Annex XVIII of Regulation (EU) 833/2014 and in Annex XXV of Regulation (CE) 765/2006, amended by the Regulation (EU) 2024/1865 above the Threshold Value, whether or not originating in the Union, respectively to Russia or for use in Russia and/or to Belarus or a country considered to be at risk of circumventing the sanctions imposed against Russia and Belarus (the so-called "countries exposed to the risk of circumvention<sup>2</sup>"), or for use in Russia or Belarus
- directly or indirectly, provide technical assistance, brokering services or other related services related to the luxury goods listed respectively in Annex XVIII of Regulation (EU) 833/2014 and in Annex XXV of Regulation (CE) 765/2006, amended by the Regulation (EU) 2024/1865, above the Threshold Value, to any natural or legal person, entity or body in Russia or for use in Russia and/or in Belarus, or for use in Russia or Belarus
- directly or indirectly, provide financing or financial assistance related to the luxury goods listed respectively in Annex XVIII of Regulation (EU) 833/2014 and in Annex XXV of Regulation (CE) 765/2006, amended by the Regulation (EU) 2024/1865, for any sale, supply, transfer or export of those goods, or for the provision of related technical assistance, brokering services or other services, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia or Belarus
- directly or indirectly, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by intellectual property rights or constituting trade secrets related to the luxury goods listed respectively in Annex XVIII of Regulation (EU) 833/2014 and in Annex XXV of Regulation (CE) 765/2006, amended by the Regulation (EU) 2024/1865 to any natural or legal person,

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<sup>1</sup> The annex contains a list of ATECO/NACE codes relating to luxury goods listed in Annex XVIII to Regulation (EU) No 833/2014 and in Annex XXV to Regulation (EC) No 765/2006, as amended by Regulation (EU) No 2024/1865.

<sup>2</sup> Armenia, Azerbaijan, United Arab Emirates, Kazakhstan, Kyrgyzstan, Turkey and Uzbekistan.



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entity or body in Russia or for use in Russia and/or in Belarus, or for use in Russia or Belarus.