

Client acceptance policy [Version 1.1]

FIBR Bank is committed to its responsibility in preventing financial crimes, including money laundering, terrorism financing, tax evasion and bribery. We have developed internal policies and procedures, together with our correspondent banks, to ensure that FIBR Bank accounts are operated in full compliance with applicable laws, regulations, and sound banking practices

In this respect, FIBR Bank enforces a client acceptance policy. This means that to become a client, a person needs to meet eligibility criteria as laid down in our client acceptance policy. This also means that if a client's circumstances change during the relationship and as a result, they no longer meet the eligibility criteria, FIBR Bank will end the client relationship within a reasonable time frame.

The eligibility criteria that FIBR Bank enforces are the following:

- Client should be a natural person of at least 18 years of age
- Client should be able to identify themselves as well as have their identity verified
- Client should have a permanent residence as well as a BSN/TIN in the country where they are applying for the product (European Netherlands* or Germany)
- Client should have a valid counter-account (nominated account) with a regulated financial institution in the Netherlands or Germany
- Client should have a valid residential address in the Netherlands or Germany
- Client should have a valid e-mail address and access to the internet
- Client should not be a US Person (subject to additional reporting obligations stemming from FATCA)**
- Client should not be subject to (international) relevant sanctions
- Client should not be subject to relevant bad press (FIBR Bank determines what is relevant bad press on a case-by-case basis)
- Client should not be a Politically Exposed Person (PEP)***
- Client should act on their own behalf

FIBR Bank may change its client acceptance policy from time to time. FIBR Bank maintains the rights to reject a (prospective) client or end the client relationship for any other reasons not mentioned in the above eligibility criteria.

* European Netherlands is the part of the Netherlands that is geographically on the European continent, thus excluding Curaçao, Aruba, Sint Maarten, Bonaire, Sint Eustasius and Saba.

** A US Person is generally defined as a natural person who is tax liable in the United States of America or any entity organized or incorporated under the laws of the US. US citizens living abroad may also be deemed US Persons.

*** PEP's are persons who hold or have held a prominent political position and the immediate family members or close associates of these persons.