

## **THE SUMMARY OF THE BC “MOLDOVA-AGROINDBANK” SA POLICY ON ANTI-MONEY LAUNDERING AND COUNTER TERRORIST FINANCING PROVISIONS**

Adhering to the highest standards in the field such as The 40 Recommendations of the International Financial Action Group (FATF-GAFI) and the documents of the Wolfsberg group, BC "Moldova-Agroindbank" S.A. (hereinafter "the Bank" or "MAIB") is guided in its activity by the provisions of the anti-money laundering and counter terrorist financing Policy, approved by the Bank's Board of Directors, hereinafter "the Policy".

The main principles of the Bank's Policy are the definition and implementation of internal procedures for the identification and valuation of the money laundering and terrorist financing risks and the implementation of actions to minimise those risks, the definition of internal procedures for customer acceptance, based on the "Know Your Client" principles, the gradual acceptance procedures and the hierarchical level of customer approval, according to its risk level, definition of products and services, which can be provided to each customer type, the description of procedures to be followed for monitoring of the customers transactions using dedicated AML software for the purpose of detecting significant, complex and non-ordinary transactions and suspicious activities, which are governed by Law No. 308 from 22.12.2017 on prevention and combating money laundering and terrorism financing (hereinafter "the Law").

According to the Policy provisions, the Bank does not allow the opening of anonymous accounts, or accounts under fictitious names, or establishing business relationships with fictitious banks (shell-banks). The Bank shall immediately apply restrictive measures in respect of goods, including those obtained from, or generated by, goods, belonging to or owned or controlled, directly or indirectly, by persons, groups and entities included in the List of Sanctions International Fund-Blocking funds issued by the UN and the EU. The Bank, at the same time, recognises the importance and applies the requirements of international sanctions issued by the US Treasury Department (OFAC).

MAIB applies the FATCA requirements in its activity, in accordance with the provisions of the Inter-Governmental Agreement type 2, between the Government of the Republic of Moldova and the US government and the legislation in force governing the application of the provisions of the agreement.

The Bank applies enhanced due diligence in case of customers and transactions in and/or out of jurisdictions that do not require the application of “Know your customer” procedures and keeping records relating thereto. The Bank is terminating the business relationships with clients that are engaged in transactions or activity that poses an increased the risk of the Bank involvement in money laundering or terrorist financing actions/transactions.

The Bank preserves all documents and information about customers and beneficial owners obtained during due diligence measures, throughout client active business relationship with the Bank and for a period of 5 years after its completion, and subsequently up to 5 years in electronic form.

Personal data provided by customers, are processing by the Bank in accordance with the applicable provisions of legislative acts, which govern data protection.

There is a designated member of the Management Board responsible for ensuring compliance with the regulatory requirements on preventing and combating money laundering and terrorist financing.

Each of the MAIB's employees, irrespective of its position or business line, benefits from continuous training in order to understand and prevent the phenomenon of "money laundering and terrorist financing". The Bank provides internal and external training including qualification and accreditation courses in the respective domain to employees responsible for “Know your customer” procedures for the purpose of preventing money laundering and terrorist financing.