

## SUMMARY OF THE PROVISIONS OF THE BC ANTI-FRAUD POLICY

approved by the decision of the Bank's Council of 12.12.2025 (minutes no. 29)

BC 'MAIB' S.A. (hereinafter referred to as the 'Bank') has developed the Anti-Fraud Policy (hereinafter the 'Policy'), approved by the Bank's Council, with the aim of establishing a general framework for the implementation of an internal control mechanism designed to prevent fraud attempts and to contribute to maintaining high professional standards of transparency, ethics, and integrity. This mechanism aims to protect the Bank's assets, as well as the legitimate interests of its customers, shareholders, and employees.

The Bank promotes a zero-tolerance policy toward fraud and any practices that do not comply with the moral and professional standards governing the conduct of the Bank's employees, both from an ethical and professional perspective. The Bank also adopts the same firm stance toward non-compliant practices of its business partners (individual and corporate customers, suppliers of goods, works, and services, and other partners). The Bank encourages its employees to always act with honesty and dignity, fostering a corporate culture in which fraud and corruption are not tolerated and where each employee adheres to the highest standards of integrity.

The objective of the Anti-Fraud Policy of BC 'MAIB' S.A. (hereinafter the 'Policy') is to establish a clear regulatory framework for the prevention and management of fraud and corruption cases within the Bank, including procedures related to the reporting of suspected fraud, corruption, abuse, or ethical concerns. To achieve this objective, the Policy defines the roles, duties, and responsibilities of the Bank's governing body, structural units, and employees.

The control environment creates and maintains a corporate culture based on honesty, professionalism, and high ethical standards, promoting appropriate conduct, while also relying on the application of appropriate sanctions for violations of the Code of Ethics and/or this Policy. It includes the Bank's firm stance toward cases of fraud and corruption and provides for the implementation of effective controls to prevent, deter, and detect fraud.



The general principles of integrity and of preventing corruption and fraud adopted within the Bank are as follows:

1. Zero tolerance toward acts of corruption, fraud, and other illegal activities.
2. Shared responsibility – the prevention and reporting of fraud is the obligation of all employees, not only of specialized functions.
3. Integrity and transparency – decisions and conduct must reflect the ethical values of the organization. All activities must be carried out with honesty, impartiality, and respect for ethical and legal standards.
4. Confidentiality – all reports, investigations, and information regarding cases of fraud or corruption are managed in strict compliance with confidentiality and data protection requirements.
5. Presumption of good faith – reports submitted by employees concerning suspicions of fraud or corruption are treated seriously and considered to be made in good faith, without negative consequences for the reporting person.

Within the Policy, the stages of fraud management and the allocation of responsibilities to the relevant subdivisions are established for each stage, as follows:

- Prevention, which aims to avoid the occurrence of fraudulent behavior through a set of proactive measures, including: establishing and promoting a Code of Ethics and high standards of professional integrity; developing an organizational culture based on integrity, accountability, and zero tolerance toward fraud and corruption;
- Detection, which aims to identify illicit/fraudulent behavior or illicit/fraudulent omissions, in real time or immediately after occurrence, thereby reducing exposure and impact on the Bank and/or MAIB customers and partners;
- Deterrence, which seeks to reduce the motivation of potential fraud perpetrators through: internal communication of anti-fraud messages and campaigns; cooperation with law enforcement authorities; informing customers and providing 24/7 support channels; monitoring and controlling access to information systems;
- Reporting of suspected fraud, which consists of the obligation of all Bank employees to report suspicions of fraud;
- Recovery of damages, which consists of using legal means to compensate for losses generated by fraud.



The Bank continuously carries out activities to identify, assess, and manage fraud risks through an integrated process that includes:

- Continuous monitoring of transactions and operations, both financial and non-financial, to detect unusual or suspicious activities;
- Use of advanced technologies, including machine learning applications and scoring models, to identify abnormal and potentially fraudulent behavior;
- Implementation of anti-fraud controls throughout the entire lifecycle of the customer relationship, covering access, authentication, transactions, and changes to settings, in order to prevent and identify risks;
- Establishment of limits and restrictions on banking products and services to reduce potential abuse;
- Analysis of fraudulent patterns and trends, including through the correlation of data from various channels and sources;
- Updating internal rules and controls based on identified scenarios and risks;
- Supervision of employees' operations and implementation of additional control measures where necessary;
- Application of corrective and remedial measures for risks deemed unacceptable.

For the effective management of fraud risks, the Bank uses specialized technologies and solutions that include:

- Real-time transaction monitoring systems based on predefined anti-fraud rules and adaptable scenarios;
- Monitoring of relevant non-financial operations (authentication, changes to settings, device and card management);
- Periodic data-driven analyses and controls to identify trends and suspicious behavior;
- Implementation of predictive models and algorithms for assessing transactional profiles and identifying non-compliant or suspicious behavior;
- Generation and periodic distribution of anti-fraud reports to the responsible structures for evaluation and implementation of corrective measures.



The Bank promotes an organizational culture focused on fraud prevention, based on transparency, accountability, and the active involvement of employees through the following actions:

- Management of the “antifrauda@maib.md” mailbox – a secure and anonymous channel for reporting suspicions and fraud incidents, accessible to all employees, ensuring confidentiality and protection of whistleblowers;
- Annual organization of “Anti-Fraud Week,” an event dedicated to increasing awareness and providing training in the anti-fraud field.
- Implementation of regular training and education programs for the Bank’s employees regarding fraud risks and prevention methods.

The Bank supports cooperation and the exchange of best practices in fraud prevention and management through active participation in professional networks (platforms, working groups, associations, or specialized forums) and partnerships at national and international levels. Collaborative relationships include:

- Participation in relevant associations and organizations in the financial and banking sector to facilitate the exchange of information and experience in the field of anti-fraud;
- Collaboration with other financial institutions, including local and international banks, as well as payment systems, for fraud investigations and the implementation of preventive measures;
- Cooperation with regulatory authorities and law enforcement agencies, ensuring secure information exchange, participation in joint investigations, and support in responding to fraud incidents;
- Promoting the exchange of information and best practices through collaborative projects and initiatives to strengthen the financial sector’s resilience against fraud.

**Procurement** is a strategic area for the Bank, ensuring the efficient and compliant acquisition of goods and services necessary for its operations. A fair and transparent procurement process contributes to protecting resources, maintaining public trust, and complying with regulatory and corporate governance requirements.

In the procurement process, the Bank applies strict anti-corruption and anti-bribery measures, ensuring full compliance with applicable laws and internal policies on integrity and compliance.



Offering or accepting bribes, illegal commissions, or gifts intended to influence procurement decisions is strictly prohibited, and any violation will lead to immediate disqualification from the procurement process and may result in corresponding legal liability.

The Bank supports a transparent procurement process that is open to oversight and audit. All procurement decisions, including supplier selection and contract awarding, are fully documented.

Selection criteria, selection processes, and contractual terms are clearly communicated to suppliers, ensuring open and fair competition.

## **Bribery and Corruption**

The Anti-Fraud Policy defines the fundamental criteria for preventing acts of bribery and corruption, which form the basis for the development of internal regulations and the organization of the Bank employees' activities.

Establishing criteria for classifying an action as an act of corruption within the Bank is essential for identifying and preventing this phenomenon. Corruption can manifest through bribery (giving or receiving), influence peddling, acquisition or granting of undue goods or services, abuse of office, and falsification in financial or accounting documents, which, along with money laundering practices, constitute specific forms of fraud. By clearly defining these criteria, the Bank ensures an integrated and effective approach to combating all forms of fraud and corruption.

A clear understanding of the criteria used to classify actions as corruption by employees is essential for their effective detection and prevention.

The following offenses are classified as acts of corruption or corruption-related acts:

1. Abuse of office – the intentional performance or non-performance, in the exercise of one's duties, by employees in managerial positions or with decision-making authority, of an action contrary to their responsibilities for material gain, other personal interests, or the interests of third parties, directly or indirectly, if this causes damage to the rights and legally protected interests of individuals or legal entities. Examples include preferential granting of loans in violation of regulations or influencing recruitment and promotion processes in exchange for favors.
2. Receiving a bribe – the acceptance of undue benefits by a Bank employee to influence professional activities or decisions.
3. Giving a bribe – the promise, offer, or giving, personally or through an intermediary, of goods, services, privileges, or advantages of any kind that are not due, for oneself or another person, to perform, delay, expedite, or refrain from performing an action in the exercise of the employee's duties or contrary to them.

THIS DOCUMENT DOES NOT CONTAIN ALL THE PROVISIONS OF THE ANTI-FRAUD POLICY OF BC 'MAIB' S.A. AND SHOULD NOT BE CONSIDERED A SEPARATE INTERNAL REGULATION.



4. Receiving illegal remuneration for performing work related to serving the public.
5. Influence peddling – using one's position or connections to obtain undue advantages or benefits.
6. Falsification – forgery in acts or falsification in accounting documents.
7. Violation of lending rules and loan approval policies;
8. Mismanagement or fraudulent management of the Bank;
9. Obstruction of banking supervision;
10. Exercise of official duties in a conflict of interest situation, manifested by violating the procedures for executing large-scale transactions and/or transactions with conflicts of interest within the Bank, if such actions have caused significant or particularly significant damage. This refers to any situation or circumstance where a conflict or risk of conflict arises between the objective exercise of official duties, as a member of the management body/key function holder/employee/shareholder of the Bank or representative of the Bank's shareholder, and the personal (material, non-material, and/or family) interests of the individual, in their private capacity, which could improperly influence the performance of duties and/or the objective and impartial fulfillment of the obligations and responsibilities they hold, because the personal interests of such individuals do not align with the Bank's interests.

Each employee must understand the implications of committing acts of corruption or related acts, including reputational risks, the possibility of disciplinary sanctions, and the consequences of filing complaints with competent authorities, which may result in criminal liability imposed by the state authorities empowered to enforce such measures.

The Bank does not tolerate the giving or receiving of bribes, or any other act of corruption or related act. Any information regarding acts of bribery, other corrupt acts, or internal fraud incidents/suspicions must be reported immediately by the employee.

The Bank prohibits making or accepting payments, whether directly or through third parties, to accelerate or influence certain decisions, which could be classified as bribery or other corrupt or related acts.

The acceptance or offering of gifts and benefits is managed with the utmost care to prevent any risk of improper influence on decisions or conflicts of interest.

Gifts that are permissible, provided for business purposes and within the limits of internal regulations, may help maintain proper and transparent professional relationships.

It is strictly prohibited to accept or offer inadmissible gifts or benefits intended to influence employees' decisions or obtain undue advantages.



The core provisions of the Bank's Anti-Fraud Policy focus on determining the procedures and responsibilities established within the Bank for the investigation, assessment, and reporting of fraud risk; ensuring the training of the Bank's employees through professional development programs designed for all employees; establishing rules to guarantee confidentiality and the protection of personal data during the examination and investigation of suspected fraud, starting from the initiation of the review and throughout the investigation process; and protecting individuals who report a suspected fraud from coercion, discrimination, or other forms of unfair treatment, except in cases where legal requirements apply.