



SUMMARY OF BC “MAIB” S.A. POLICY IN THE FIELD OF PREVENTING AND COMBATING MONEY LAUNDERING AND TERRORIST FINANCING,

approved by the decision of the Bank’s Board of Directors of 19.09.2022 (minutes No.17),

in force from 04.10.2022

Adhering to the highest international standards in this area such as the Basel Committee on Banking Supervision documents, EBA (European Banking Authority) Guidelines, Financial Action Task Force (FATF-GAFI) Recommendations and Wolfsberg Group documents, BC „MAIB” S.A. (hereinafter „Bank” or „**maib**”) is guided in its activity by the provisions of the Policy on the Preventing and Combating Money Laundering and Terrorist Financing (hereinafter "Policy").

According to the Policy provisions, the Bank determines the factors, which give rise to increased money laundering and terrorist financing risks, and which determine the need to apply enhanced customer due diligence measures. In addition, the Bank determines the categories of customers that shall be considered unacceptable for the initiation or continuation of the business relationship and/or for the transactions processing, based on the pre-established limits, including occasional customers.

The Bank shall not admit the opening of anonymous accounts or accounts in fictitious names, or the establishment or continuation of business relationships with fictitious banks (shell banks) or banks that are known to allow shell banks to use their accounts or that provide anonymous accounts for their customers.

The Bank pays particular attention to customers and transactions in and/or from jurisdictions that do not require the application of know-your-customer and related record-keeping procedures.

The Bank terminates unilaterally business relationships with customers, whose transactions or activities present an increased risk of the Bank's involvement in money laundering or terrorist financing activities/transactions.

The Bank acknowledges the importance of and applies the requirements of the international financial sanctions adopted by the United Nations (UN), the European Union (EU) and the Office of Foreign Assets Control, U.S. Department of the Treasury (OFAC). The Bank shall not establish business relationships with individuals or legal entities included in at least one of the international financial sanctions lists adopted by the UN, EU and OFAC (SDN List) or with legal entities controlled by such persons, as well as shall not accept the processing of any operations or transactions, initiated by, or in behalf of or through persons included in at least one of those lists, that would violate the regime of international financial sanctions.

The Bank shall not enter into business relationships, including the opening of accounts and the acceptance and/or movement of any funds through accounts, and shall immediately apply restrictive measures with respect to assets, including those derived from or generated by assets owned or controlled, directly or indirectly, by persons, groups and entities, involved in terrorist activities and proliferation of weapons of mass destruction, subject to restrictive measures, included in the UN, EU lists and supplementary list of the Intelligence and Security Service of the Republic of Moldova, as well as legal entities owned or controlled, directly or indirectly, by such persons, groups and entities.

Maib applies in its activity FATCA (Foreign Account Tax Compliance Act) requirements, according to the provisions of the Type 2 Intergovernmental Cooperation Agreement between the Government of the Republic of Moldova and the USA Government to facilitate the implementation of the provisions of this Act and of the legislation in force, which regulates the application of the indicated Act's provisions.

The Bank retains all documents and information about customers and beneficial owners obtained within the customer due diligence measures, for the active period of the business relationship and for a period of 5 years after its termination or after the date of occasional transactions, and thereafter for up to 5 years in electronic format.

Personal data processed within **maib** shall be treated in accordance with the provisions of the legislation in force and applicable international rules governing the personal data protection.

In the Bank is appointed the person – member the Management Board, responsible for ensuring compliance with the regulations in force on preventing and combating money laundering and terrorist financing.

Each employee of **maib**, regardless of his /her position and the business line, has access to training in order to understand and prevent the phenomenon of „money laundering and terrorist financing”, the training programs being planned depending on the level of employees' involvement in the process of preventing and combating money laundering and terrorist financing. The Bank ensures on an ongoing basis that employees responsible for customer due diligence for the purpose of preventing money laundering and terrorist financing have access to internal or external professional training activities, including relevant qualification and accreditation courses.

All the activities carried out within the Bank in the field of preventing and combating money laundering and terrorist financing, are based on the main Policy's principles, among which: establishing and implementing procedures to identify, assess and control money laundering and terrorist financing risks and taking measures to minimize them; defining internal customers' acceptance procedures, based on the "Know Your Customer" principles, the gradual acceptance procedures and the hierarchical level of approval of clients according to the associated risk level, the types of products and services that can be provided to each category of clients; defining procedures for ongoing monitoring of customers' transactions, including in an automated way, using dedicated applications, in order to detect significant, complex and unusual transactions and potentially suspicious activities and transactions that fall under the Law on preventing and combating money laundering and terrorist financing No.308 as of 22.12.2017; defining procedures that ensure the identification, prevention and management of international financial sanctions risk by implementing automated screening of customers and transactions against the international financial sanctions lists adopted by the UN, EU and OFAC.