



## **THE SUMMARY OF THE BC “MAIB” SA COMPLIANCE POLICY PROVISIONS**

BC “MAIB” SA (hereinafter „the Bank”) has developed the Compliance Policy (hereinafter "the Policy") approved by Bank’s Board of Directors, for promoting a high compliance culture by the implementation and the development of an appropriate and effective internal control framework for identifying, assessing and monitoring of the compliance risk.

The Bank implements the best practices and aims to maintain the highest professional standards of transparency, ethics and integrity in order to ensure sustainable and efficient corporate governance.

The main provisions of the Bank’s Compliance Policy are to establish and define the role of the compliance function, such as the identification, assessment, monitoring and reporting of the compliance risk, to ensure the compliance of Bank's activities to all applicable laws, policies and regulations, to conduct regular testing of the compliance risk indicators for assessing the level of the Bank’s exposure to such risk.

The Policy emphasizes certain Compliance principles, which relate to promoting by the Bank employees of a strong professional behavior, to comply with applicable laws, regulations and professional standards requirements, to avoid conflicts of interest, to ensure confidentiality when performing professional duties, to protect the Bank assets and clients’ interests and exercising the right of communicating and notifying compliance risk cases, internal fraud suspicions, abuse or other ethical issues.

The Policy states the independence of the compliance function, stipulates the collaboration with the Internal Audit and other Bank’s divisions, and emphasizes the responsibilities of the Bank’s Senior management such as the Board of Directors and the Executive Committee, and their role in an efficient management and supervision of the compliance risk.

The Bank's compliance function should develop and implement continue staff education programs, which would include periodical trainings of all staff on compliance issues.

Each Bank employee is responsible to follow and to maintain a compliance culture within the Bank, to comply with applicable law and regulations either in business or personal behavior.