

SUMMARY OF PROVISIONS OF THE ANTI-FRAUD POLICY OF CB „MOLDOVA-AGROINDBANK” S.A.

BC "Moldova Agroindbank" S.A. (hereinafter "the Bank") has developed an Anti-Fraud Policy (hereinafter "the Policy"), approved by the Bank's Board of Directors, with the aim of developing an internal control system, which would contribute to inhibiting fraud attempts, maintaining high professional standards of transparency, ethics and integrity and ensuring a fair process of investigation of suspected fraud and other illegalities detected in the process of carrying out the activity of employees within the Bank.

The objective of the Policy is to establish the regulatory framework for the prevention and management of fraud and corruption within the Bank, including information obtained on suspicions of fraud, abuse or ethical issues. To achieve this objective, the Anti-Fraud Policy defines the roles, duties and responsibilities of the Bank's governing bodies, sub-units and employees.

The Policy sets out the stages of fraud management and establishes the responsibilities of the responsible subdivisions at each stage: **prevention**, by clearly defining the responsibilities of the bank's sub-units responsible for fraud risk management, including the implementation of effective measures to mitigate this risk; **detection**, by establishing an identification system based both on anti-fraud procedures and on various automated tools and solutions designed to detect potential frauds; **impeding**, by discouraging potential fraudsters from acting to the detriment of the Bank, by highlighting the risks in detecting the perpetrators and applying internal and legal measures; **Notification of suspected fraud**, by highlighting the responsibility of all employees to prevent and impeded fraud and other illegal practices; **Recovery**, by using legal procedures to recover all or part of the damage caused from the persons responsible for causing it.

The basic provisions of the Bank's Anti-Fraud Policy are to determine the modalities and *responsibilities established within the Bank in the process of investigating, assessing and reporting fraud risk, ensuring the conduct of training of Bank employees* by developing professional development programs for all Bank employees, establishing rules to *ensure confidentiality and protection* of personal data in the process of examining and investigating suspected fraud, from the initiation of the examination and throughout the investigation, and protecting persons reporting suspected fraud from coercion, discrimination or other unfair treatment, except where legally required

The Bank promotes a zero-tolerance policy towards fraud or practices that do not meet the standards of moral and professional conduct of Bank employees, who are encouraged to conduct their work honestly and with dignity, following the highest standards of integrity.