SUMMARY OF PROVISIONS

COMPLIANCE POLICY OF C.B "VICTORIABANK" JSC

C.B. “Victoriabank” JSC (hereinafter referred to as the Bank) undertakes to carry out its activities respecting national law, the best practices and the highest professional standards of ethics, honesty and integrity.

In order to ensure effective compliance risk management, has been issued the Compliance Policy, (hereinafter referred to as the Policy). This is an internal regulation, approved at the level of the Bank's Board of Directors, which establishes the general principles binding on the members of the management bodies, key holders and employees of the Bank. It is developed in accordance with the national regulations, the internal regulations of the Bank, the regulations of the Banca Transilvania Financial Group and the European Union, insofar as they are applicable.

The purpose of this Policy is to provide the basic legal framework, necessarily to meet the objectives of the compliance function, namely the identification, assessment, monitoring, reporting, management and mitigation of compliance risk.

The exercise of the compliance function is ensured by the Compliance Department, which is independent and autonomous from the business and operational structures / functions.

In C.B. “Victoriabank” JSC, all employees and members of the management bodies are guided in their work by the following principles:

- **Reputation** - the Bank carries out its activity in compliance with the general principles of professional ethics, and the members of the Bank's managing body, persons holding key functions and its employees have the obligation to respect the norms of the Code of Conduct and to prevent situations that could damage the Bank's reputation. The Bank's reputation is the most important precondition for the sustainable development of the Bank;
- **Integrity** - the members of the Bank's managing body, persons holding key functions and employees of the Bank are guided by the principle of applying an attitude of responsibility towards the customers of the Bank, third parties and partners, as well as the quality performance/fulfilment of their obligations;
- **Transparency** - the Bank carries out its activity in a manner open to the society, ensuring a high degree of transparency in accordance with requirements of the legislation in force, free and unrestricted access to information on its activity, including on the capital market, provides detailed information regarding the products and services offered;
- **Ethics** - the Bank's employees adopt and promote the professional ethical principles and standards of business communication, at the same time requesting partners and third parties to comply with the highest standards of business conduct;
- **Avoidance of conflicts of interest** - the members of the Bank's managing body, persons holding key functions and employees of the Bank avoid any situation or circumstance that in the personal interest, directly or indirectly, contravenes the Bank's interests, so that they may affect their independence or impartiality in making decisions or fulfilling in a timely and objective manner the obligations incumbent upon them in the exercise of their duties, activities, which, as a consequence, may seriously damage the reputation of the Bank;

- **Inevitability of liability** - the members of the Bank's managing body, persons holding key functions and employees Bank are required to respect the provisions of the national legislation, the internal normative framework, including the requirements of the Compliance Policy. Any unavoidable violation or deviation will be sanctioned according to the legislation in force;
- **Know your client** - the Bank's activity is based on the need to know and confirm the legality of clients' activities and to ensure that they are not related to money laundering and terrorist financing, and do not produce the risk of financial sanctions or reputational damage to which the Bank may be exposed;
- **Customer-focus** - the Bank offers customers quality products and services according to their needs, ensuring a balance and harmony of their interests with the Bank's development needs
- **Confidentiality** - the members of the Bank's managing body, persons holding key functions and employees of the Bank are required to ensure the confidentiality of data accumulated or administered, to refrain from formal or informal sharing of any information regarding the Bank's operations and activities, to ensure keeping business secrets and confidential customer information, except for the data requested by the competent authorities. Employees are required to maintain the confidentiality of information throughout the activity period, as well as after cessation of activity within the Bank;
- **Parsimony -** the members of the Bank's managing body, persons holding key functions and employees of the Bank are responsible for protecting the Bank's and customers' tangible and intangible assets. They will only be used for the purposes provided. Inappropriate management or unauthorized sharing is a breach of obligations to the Bank. The Bank allocates sufficient resources necessary for the development of the compliance system and culture, which covers all subdivisions and processes within the Bank;
- **Protection against market manipulation** - the Bank undertakes sustained efforts to limit and prevent the possibility of manipulation on the securities market, including on the basis of inside information. All cases of disclosure, misuse of inside information and market manipulation are investigated and managed in accordance with the legislation in force;
- **Whistleblowing** - the Bank provides safe and secure mechanisms and channels for alerting frauds, ethical issues and risks that the Bank may be subject to, while preserving and protecting the anonymity of persons reporting such breaches;

Employees, members of the governing bodies as well as customers of the Bank may report any incident or suspicion of violation of national and internal regulations via mailbox - myalert@vb.md. The request may be submitted from a personal or anonymous e-mail, the Bank ensuring the anonymity of the sender.

At the same time, the Bank's staff is trained in compliance risk through courses regularly developed by the Compliance Department, in this way, the Bank ensuring the applicability of national and internal regulations in the work of each employee, regardless of the position held, and promotes an advanced compliance culture.