SUMMARY OF THE PROVISIONS

OF THE ANTI-CORRUPTION POLICY OF CB "VICTORIABANK" JSC

The anti-corruption policy within CB Victoriabank JSC establishes the Bank's position regarding the corruption phenomenon, as well as it reiterates that the Bank is devoted to fight against the corruption in all its aspects, where the corruption refers on use by the employee/member of the management body of his position, contrary to the law, in personal interest, for himself/ herself or another person, in exchange of receiving or accepting, directly or indirectly, some material or nonmaterial benefits.

The policy establishes the actions for prevention and combating corruption, defending and ensuring the rights and liberties of the employees, the Bank's interests, its clients and shareholders and elimination of the consequences of corruption acts. All the bank's staff and members of the management bodies respect it.

In order to ensure the application of the provisions of the Policy, the Bank aims to:

1. cultivating integrity within the Bank and prevention of corruption manifestations.
2. Staff and management bodies' accountability for consolidation of the institutional integrity climate, as well as sanctioning the lack of integrity professionalism.
3. management bodies' accountability for evaluating and monitoring of the institutional integrity, as well as sanctioning its lack.

The Bank has identified, from the international and national standards, the following areas in which there is a high risk of corruption, or which may be instrumental to the commission of, corrupting behavior:

- Gifts and entertainment expenses;
- Charity donations and sponsorships;
- Relationships with third parties (suppliers and others who collaborate with the Bank);
- Purchase, management and disposal of investments and other assets;
- Hiring of staff;
- Purchase, management and sale of real estate.

In order to ensure the realization of efficient and prudent governance, the Bank must follow, in the management of operational processes, the following rules:

- The separation of duties by adequately allocating responsibilities and establishing appropriate authorization levels in order to avoid functional overlaps or operating allocations that concentrate activities on a single person;
- Clear and formalized allocation of powers and responsibilities, expressly indicating the limits of those powers and consistent with the duties assigned and positions covered within the organizational structure;
- Appropriate procedures for performing the activities properly;
- Control and supervisory activities on Bank's transactions are in place and traceable.

The employees, members of management bodies, customers of the Bank, as well as its suppliers can report any incident or suspected violation of national and internal regulations, through a mailbox made available to them - myalert@vb.md. The request can be submitted from a personal or anonymous e-mail, the Bank ensuring the anonymity of the sender.