



The summary of the Policy of preventing and combating money laundering, the financing of terrorism, the proliferation of weapons of mass destruction and the enforcement of international sanctions within the CB "Victoriabank" JSC

The Policy of preventing and combating money laundering, the financing of terrorism, the proliferation of weapons of mass destruction and the enforcement of international sanctions within CB Victoriabank JSC (hereinafter, Policy) is a Bank strategy of the CB Victoriabank JSC (hereinafter, the Bank) in compliance area, developed to ensure that the Bank operates in accordance with national and European legal obligations and that of the Banca Transilvania Group in terms of client knowledge, money laundering prevention, the financing of terrorism, the proliferation of weapons of mass destruction and international sanctions. By applying these rules, the Bank aims to ensure and comply with prudent, wholesome practices in the field of compliance, promoting high standards of ethics and professionalism aiming the elimination of the practices of using the Bank, in carrying out criminal activities by its clients.

The **objective** of the Policy is to:

- Ensure the efficient management of the client knowledge process in order to prevent and combat money laundering and terrorism financing, as well as the implementation of international sanctions for blocking funds;
- Protect the security, integrity and reputation of the Bank, by reducing the compliance risk from the perspective of client behavior;
- Establish and promote a system of proper treatment of new and existing clients, which should ensure the exclusion of any negative impact on clients in good faith a result of the application of the provisions of AML / CFT / SI;
- Promote the possibility to develop business relationships with clients based on a more detailed knowledge of their activity, and, consequently, their needs regarding products / services;
- Determine the elements and measures that will be taken into account by the Bank's employees, in order to know the clients, to identify, quantify and reduce the risk of money laundering or terrorism financing.

The legal framework governing the assessment of money laundering and terrorist financing risks at the level of BC "Victoriabank" SA (hereinafter referred to as "the Bank"), is represented by:

- Law on preventing and combating money laundering and terrorism financing no. 308 from 22.12.2017 with the subsequent amendments and additions;
- Law on the application of international restrictive measures no. 25 of 04.03.2016 with subsequent amendments and additions;
- Law on the prevention and combating of terrorism no. 120 of 21.09.2017 with subsequent amendments and additions;
- Law on protecting personal data no. 133 from 08.07.2011 with the subsequent amendments and additions;
- NBM Regulation on the framework for managing the activity of banks, approved by Decision of the Executive Committee no. 322 from 20.12.2018;
- NBM Regulation on requirements regarding preventing and combating money laundering and terrorism financing in the activity of the banks, approved by the Decision of the Board of Directors no. 200 from 09.08.2018; etc.

Any legal regulation in this field, issued after the issuance of this document and related to this field. The above-mentioned legislative provisions are interpreted and corroborated in the light of the international documents, such as the Financial Action Task Force (FATF) Recommendations, Wolfsberg Group documents and other international guidelines.

According to the Policy, all employees of the Bank are responsible for ensuring compliance of the Bank's business with AML / CFT / International Sanctions legislation and standards and the Policy as well.

The Bank appoints the persons entrusted with the execution of Law 308/2017 regarding AML/CFT, including those with senior management positions, whose names are communicated, within 5 working days from the date of appointment, to the local FIU and the bodies with supervisory functions provided for in art. 15 para. (1) of Law 308/2017 on AML/CFT, together with the nature and limits of responsibilities. The persons indicated, as well as other responsible employees, have access to the results of due diligence measures regarding clients, including identification data and data on the activities and transactions carried out, as well as other relevant information necessary to comply with the provisions of law 308/2017 regarding the AML/CFT.

The Bank's management bodies have the responsibility to ensure and, respectively, to permanently monitor the implementation of legal and internal requirements at the Bank level, including the way in which the AML / CFT / International Sanctions risk is identified, monitored and managed within the compliance risk

The Bank does not allow the opening of anonymous accounts, or accounts under fictitious names, or establishing business relationships with fictitious banks (shell-banks).

The Bank adopts appropriate client awareness measures in order to prevent money laundering and the financing of acts of terrorism and, for this purpose, based on risk, applies standard, simplified or increased client due diligence measures.

The bank identifies politically exposed persons at the time of establishing the business relationship, during the activity and in the case of occasional transactions, both for the bank account holder, who holds this position, as well as for the authorized representative, legal representative and beneficial owner, with the application of enhanced due diligence measures.

The Bank aligns itself with the international restrictive measures that are established:

- a) through the resolutions of the Security Council of the United Nations Organization, adopted based on the provisions of art. 41 of the United Nations Charter;
- b) through the documents of the European Union to which the Republic of Moldova has aligned itself;
- c) through the acts and decisions adopted by international organizations or other states, to which the Republic of Moldova has aligned itself;
- d) by the Republic of Moldova on its own initiative.

Due to the membership of BC "Victoriabank" SA to the Banca Transilvania Group within the European Union, the Bank is obliged to comply with all regulations regarding international sanctions implemented at the level of the European Union, in the same time, the bank recognizes the importance and applies the requirements of international sanctions issued by the US Treasury Department (OFAC).

The Bank will not engage in any activity that involves the structuring of transactions for the stated or apparent purpose of avoiding prohibitions or sanctions restrictions.

The Bank provides staff with appropriate training in the field of preventing and combating money laundering, the financing of terrorism, the proliferation of weapons of mass destruction and the enforcement of international sanctions.

The purpose of training is ensuring compliance with obligations imposed by the Law on preventing and combating money laundering and terrorism financing no. 308 from 22.12.2017 with the subsequent amendments and additions, creating an institution culture by increasing the sense of responsibility of staff on policy and procedures of institution and on risk-based approach and updating of staff information.

All other AML/CFT documentation, such as Wolfsberg Questionnaire and US Patriot Act is available on our webpage: <https://www.victoriabank.md/en/despre-noi/despre-banca/chestionare> .