

**Questionnaire on the rules and activities of the financial institution
in preventing and combating money laundering**

1.	Full legal name of the financial institution.	Commercial Bank "Victoriabank" Joint Stock Company
2.	Legal type of organization	JOINT STOCK COMPANY
3.	State Registration Date	14.06.2001
4.	Registration body	Public Services Agency
5.	Registration Number	1002600001338
6.	License number issued to the bank to perform banking operations and the date of issuance	A MMII 004503 issued on 06.02.2018
7.	License withdrawn, date and reason for withdrawal (if any)	N/A
8.	Correspondent account at the National Bank of Moldova	35216701
9.	Legal Address	MD-2004, 31 August 1989 str, 141, Chişinău, Republic of Moldova
10.	Postal Address	MD-2004, 31 August 1989 str, 141, Chişinău, Republic of Moldova
11.	Financial institution's management address	MD-2004, 31 August 1989 str, 141, Chişinău, Republic of Moldova
12.	Contact telephone number	https://www.victoriabank.md/en/contacts/retea-unitati
13.	E-mail	office@vb.md
14.	SWIFT	VICBMD2X
15.	REUTERS	MVIK01
16.	FATCA Identification Code (GIIN)	B9XN3D.99999.SL.498
17.	Financial institution's website address	https://www.victoriabank.md/
18.	Number of branches/representatives in the country of registration	The Bank's network reported at 14.07.2025: Branches - 24; Agencies - 40
19.	The location of the financial institution's representative offices abroad (if any)	N/A
20.	Information on the governing bodies of the financial institution (structure of the governing bodies of the legal person and brief biographical information* on the natural persons who are members of the board and executive bodies of the legal person.) *Data on education and experience in banking.	https://www.victoriabank.md/en/despre-noi/publicarea-informatiei/quvernanta-bancii
21.	History, reputation, market sector and competition	https://www.victoriabank.md/en/despre-noi/povestea-victoriabank
22.	Most important activities under the license	https://www.victoriabank.md/en/despre-noi/publicarea-informatiei/quvernanta-bancii

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23. Information on the independent auditor (for previous and current financial year)

Deloitte Audit SRL

24. List of correspondent/respondent banks (NOSTRO and LORO accounts)<https://www.victoriabank.md/en/money-transfer/swift>**25. Size of the financial institution's share capital at the end of the last financial year**

250,000,910 MDL

26. Name / Name, first name, surname and residence of the shareholders of the financial institution holding 5% and more of the capital of the financial institution.**Data relating to individuals:**

Name, Surname	Țurcan Victor
Date of birth (dd.mm.yyyy)	08.07.1948
Share in the charter capital (ordinary, privileged shares)	10.76 %
Name, Surname	Țurcan Valentina
Date of birth (dd.mm.yyyy)	04.06.1949
Share in the charter capital (ordinary, privileged shares)	8.07 %

Data on Legal persons:

	Name of shareholders	Country of residence	Participation share, %	Voting rights, %
	VB INVESTMENT HOLDING B.V.	Netherlands	72.19	72.19
	Indirect owners within CB „Victoriabank” JSC: Banca Transilvania SA	România	44.61	44.61
	Indirect owners within CB „Victoriabank” JSC: European Bank for Reconstruction and Development	Great Britain	27.57	27.57

27. Data on the beneficial owner within the financial institution.

Name, Surname	Levon Khanikyan
Date of birth (dd.mm.yyyy) and Place of birth	17.01.1980, Armenia
Function held	President, CEO
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Vasile Donica
Date of birth (dd.mm.yyyy) and Place of birth	23.09.1978, Republic of Moldova
Function held	Vice-president, CBO Corporate
Public position held (politically exposed person – PEP (Yes/No))	No

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Name, Surname	Corniciuc Vitalie
Date of birth (dd.mm.yyyy) and Place of birth	29.10.1985, Republic of Moldova
Function held	Vice-president, CFO
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Maloș Elena-Ionela
Date of birth (dd.mm.yyyy) and Place of birth	03.05.1981, România
Function held	Vice-president, COO
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Aursulesei Mihai-Mircea
Date of birth (dd.mm.yyyy) and Place of birth	18.11.1978, România
Function held	Vice-president, CBO Retail
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Popa Bogdan-Dumitru
Date of birth (dd.mm.yyyy) and Place of birth	12.10.1978, România
Function held	Vice-president, CRO
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Grasse Thomas Gunther
Date of birth (dd.mm.yyyy) and Place of birth	15.05.1955, Germany
Function held	Chairman of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Țurcan Victor
Date of birth (dd.mm.yyyy) and Place of birth	08.07.1948, Republic of Moldova
Function held	Vice-president of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Moisă Tiberiu
Date of birth (dd.mm.yyyy) and Place of birth	21.07.1975, România
Function held	Member of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Sabaz Mehmet Murat

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Date of birth (dd.mm.yyyy) and Place of birth	20.08.1969, Turkey
Function held	Member of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Franklin Peter Morris
Date of birth (dd.mm.yyyy) and Place of birth	08.08.1953, Hong Kong
Function held	Member of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Henry Emanuel Russell
Date of birth (dd.mm.yyyy) and Place of birth	01.05.1959, Great Britain
Function held	Member of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No
Name, Surname	Costin Ludmila
Date of birth (dd.mm.yyyy) and Place of birth	27.06.1973, Republic of Moldova
Function held	Member of the Board of Directors
Public position held (politically exposed person – PEP (Yes/No))	No

28. Name, address and website of the institution(s) supervising the activity of the financial institution.

- National Bank of Moldova, Address: MD – 2005, Grigore Vieru avenue, 1, Chişinău, Republic of Moldova, web address: www.bnm.md
- Office for Prevention and Combating of Money Laundering, Address: MD – 2005, Mitropolit Gavril Bănulescu-Bodoni str., 26, Chişinău, Republic of Moldova, web address: <https://spscb.md/ro>

29. The name of the legislative acts regulating the activity of preventing and combating money laundering and terrorist financing in the country of registration of the financial institution, the date of their approval (entry into force) and the address of the website where these acts are published.

1. Regulation on the requirements on preventing and combating money laundering and terrorist financing in the activity of banks, approved by the Decision of the Executive Board of the National Bank of Moldova no.200 of August 9, 2018, <https://www.bnm.md/en/content/regulation-requirements-related-prevention-and-combating-money-laundering-and-terrorist>
2. Law no. 308/2017 on prevention and combating money laundering and terrorism financing, https://www.legis.md/cautare/getResults?doc_id=146050&lang=ro#
3. Law no.75/2020 on AML/TF infringements detection procedure and means of sanctions' application, https://www.legis.md/cautare/getResults?doc_id=136914&lang=ro
4. Law on the activity of banks no. 202 of 06 october 2017, <https://www.bnm.md/en/content/law-banks-activity-no-202-06-october-2017>
5. Law on Foreign Exchange Regulation no 62-XVI of 21 March 2008, https://www.legis.md/cautare/getResults?doc_id=147813&lang=ro#
6. Order on the approval of the Methodology on how to complete and submit the special forms on the activities or transactions covered by the Law no. 308/2017 on preventing and combating money laundering and terrorist financing and the Instructions for their completion - ORDER no. 20 of 03.08.2023, <https://spscb.md/en/page/legislatia-nationala>
7. Order on the Approval of the Guidelines on the Identification and Monitoring of Politically Exposed Persons and Risk Indicators on Politically Exposed Persons (PEPs) - ORDER no. 23 of 06.09.2023, <https://spscb.md/en/page/legislatia-nationala>
8. Guidelines for identification of terrorist financing suspicious activities and transactions - ORDER no.16 of 20.07.2023, <https://spscb.md/en/page/legislatia-nationala>

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9. Guidelines for the identification and reporting of money-laundering suspicious activities or transactions - ORDER no. 15 of 20.07.2023, <https://spscsb.md/en/page/legislatia-nationala>

30. List the domestic regulatory documents regulating the prevention and combating of money laundering and terrorist financing.

- Policy on preventing and combating money laundering, terrorist financing, proliferation of weapons of mass destruction and the application of international sanctions within B.C. Victoriabank S.A., with amendments approved by the Board of Directors on 10.04.2025;
- Procedure Preventing and combating money laundering, terrorist financing and proliferation of weapons of mass destruction, within B.C. Victoriabank S.A., with amendments approved by the Management Board on 10.04.2025;
- Procedure Monitoring customer transactions and business relationships within B.C. Victoriabank S.A., with amendments approved by the Management Board on 25.03.2025.

31. Description of the existing policy in your bank regarding the control of compliance with the requirements of internal regulatory documents as well as the provisions of the legislation to prevent and combat money laundering and terrorist financing.

The Policies of B.C. Victoriabank S.A. in the field of preventing and combating money laundering and terrorist financing establish the rules for identification, acceptance, monitoring of customers and their transactions in order to ensure prudent management of the Bank, appropriate management of the risks to which it may be exposed and internal control measures, including in the context of preventing and combating money laundering. The policies covered in this area establish the following rules: identification of the customer, as well as knowledge of the beneficial owner/beneficiaries, determination of ultimate beneficial control, identification of the person on whose behalf a transaction or activity is carried out and application of the risk-based approach to identify and determine the beneficial owner; customer acceptance and application of enhanced due diligence; monitoring of transactions and business relationships; reporting suspicious activities and transactions; information retention and maintenance; and internal control in the area of AML/CFT.

32. Name of the subdivision within the financial institution responsible for preventing and combating money laundering and terrorist financing and monitoring customer transactions.

AML Section, Compliance Department

33. Name, surname and contact information of the person responsible within your bank for preventing and combating money laundering and terrorist financing.

- Levon Khanikyan, President, CEO, AML/CFT responsible person responsible within the bank;
- Natalia Rotaru, Director of Compliance Department, e-mail: Natalia.I.Rotaru@vb.md

34. Name and basic provisions contained in the procedures developed by the financial institution with regard to customer identification and verification of the origin of customer funds.

- Policy on preventing and combating money laundering, terrorist financing, proliferation of weapons of mass destruction and the application of international sanctions within B.C. Victoriabank S.A., with amendments approved by the Board of Directors on 10.04.2025;
- Procedure on preventing and combating money laundering, terrorist financing and proliferation of weapons of mass destruction, within B.C. Victoriabank S.A., with amendments approved by the Management Board on 10.04.2025;
- Procedure Monitoring customer transactions and business relationships within B.C. Victoriabank S.A., with amendments approved by the Management Board on 25.03.2025.

The identification and acceptance rule are the first steps, which form the basis for establishing business relations with the Bank. The purpose of the monitoring rule is to ensure the creation of effective internal mechanisms for monitoring transactions and business relationships, determining the purpose and nature of the business relationship, interpreting the ordinary character of the customer's business, as well as monitoring complex and non-ordinary transactions for the prevention and combating of money laundering and terrorist financing. The main components in an effective customer transaction monitoring system are: verification of customers and their payments in real time and continuous analysis of the transactions carried out to ascertain and identify non-ordinary and complex activities and transactions. Real-time verification of customers and payments involves the examination of documents drawn up for banking operations in anticipation of their

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execution, with the aim of identifying persons involved in terrorist activities or subject to sanctions, prohibitions or other restrictions in the context of legislation on preventing and combating money laundering and terrorist financing. The given activity is applied in the course of business relationships.

35. Name and basic provisions contained in the procedures developed by the financial institution regarding the monitoring of customer transactions. Enhanced customer due diligence, identification and determination of risk and monitoring of significant customer transactions.

- Procedure Monitoring customer transactions and business relationships within B.C. Victoriabank S.A., with amendments approved by the Management Board on 25.03.2025.

In order to prevent and combat money laundering and terrorist financing, within BC Victoriabank S.A. are established effective rules for the application of increased precautionary measures related to customers and their transactions, monitoring transactions and business relationships, by determining the purpose and nature of business relationships, interpretation and determination of the ordinary character of customer activity.

36. Does the financial institution identify all customers as well as the beneficial owner when establishing business relationships or up to the opening of bank accounts? Yes No

37. Does the financial institution carry out identification of all customers when carrying out occasional transactions amounting to at least 200 thousand MDL, as well as when carrying out electronic transactions amounting to at least 20 thousand MDL, regardless of whether the transaction is carried out in a single operation or in several operations? Yes No

38. Is renewal of customer identification data foreseen? Yes No

If Yes, please indicate the periodicity.

High risk (B) - at least once a year or whenever changes are known to have occurred; Medium risk (C) - at least once every 2 years or whenever changes are known to have occurred; Low risk (D) - at least once every 3 years or whenever changes are known to have occurred.

39. Identification measures include:

- Identifying and verifying the identity of natural or legal persons, the beneficial owner, on the basis of identity documents, as well as their representative on the basis of a notarized power of attorney. Yes No
- Identifying the beneficial owner and taking appropriate risk-based measures to verify the identity of the beneficial owner so that the reporting entity is confident that it knows who the beneficial owner is in order to understand the ownership structure and control structure of the natural and legal persons. Yes No
- Obtain information on the purpose and nature of the business relationship, complex and non-ordinary transactions. Yes No
- Other (Please list) _____

40. If the individual or legal person is not personally present at the identification, your institution shall take one or more of the following types of measures:

- Ensuring that the identity of the person is established by documents, data or additional information. Yes No
- Guarantee that the first payment of transactions is made through an account opened in the person's name with a financial institution. Yes No
- Other (Please list) _____

41. In cross-border banking relationships, financial institutions shall undertake one or more of the following measures:

- The accumulation of sufficient information about a correspondent institution to fully understand the nature of its business and to ascertain from publicly available information its reputation and the quality of supervision. Yes No

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	<ul style="list-style-type: none"> ▪ Evaluation of the correspondent institution's policies to prevent and combat money laundering and terrorist financing. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Obtain senior management approval before establishing correspondent banking relationships. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Documenting the responsibility of each institution. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ A finding that, in respect of correspondent accounts, the correspondent institution has verified the identity of the customers whose transactions are conducted through its accounts, has applied ongoing due diligence and is able to provide relevant due diligence data on request. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Other (Please list) <input type="text"/>
42.	<p>In transactions or business relations with politically exposed persons, your institution shall ensure that:</p> <ul style="list-style-type: none"> ▪ Appropriate risk-based procedures to determine whether the person is politically exposed. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Obtain senior management approval for establishing or continuing business relationships with such persons. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Taking appropriate measures to establish the source of assets involved in the business relationship or transaction. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Increased and permanent monitoring of the business relationship. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ Other (Please list) <input type="text"/>
43.	<p>The financial institution shall take enhanced due diligence measures where:</p> <ul style="list-style-type: none"> ▪ Natural or legal persons receive or remit goods from/to countries that do not have anti-money laundering and terrorist financing rules or have inadequate anti-money laundering and terrorist financing rules, or represent a high risk due to high levels of criminality and corruption and/or are involved in terrorist activities. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ▪ In the case of electronic transfers, if there is insufficient information about the identity of the sender, as well as in transactions that could favor anonymity. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
44.	<p>Does your bank maintain correspondent relationships with banks that do not have a physical presence in a specific country (Shell Banks)?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
45.	<p>Are anonymous accounts opened in your institution?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
46.	<p>Does the financial institution have an automated payment monitoring system in place to track suspicious transactions and operations?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
47.	<p>During the previous financial year, has the financial institution recorded any cases/attempts to legalize illicitly obtained funds and/or terrorist financing?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
48.	<p>Does the financial institution carry out regular independent audits of its procedures for preventing and combating money laundering and terrorist financing and monitoring customer transactions?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
49.	<p>During the last 5 years, have any administrative sanctions been imposed on the bank by the supervisory bodies or criminal proceedings been instituted against the bank due to violations of the legislation on preventing and combating money laundering and terrorist financing?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, please explain <input type="text"/></p>
50.	<p>During the last 5 years, have there been any media reports about your bank's involvement in criminal activities?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, please explain <input type="text"/></p>
51.	<p>Does your bank have a policy on staff training in the area of preventing and combating money laundering and terrorist financing?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

If Yes, frequency of training

According to the Compliance Program, training shall be carried out at least annually

52.

Is it mandatory to submit at the bank's request additional documents and information proving the economic activity of the clients?

 Yes No

Your institution keeps records of information and documents of natural and legal persons, beneficial owners, register of identified natural and legal persons, archive of accounts and primary documents, including business correspondence.

 Yes No

53.

If 'Yes', indicate the retention period of the information concerned.

B.C. "Victoriabank" S.A. shall keep all documents and information necessary for compliance with the safeguards on customers and beneficial owners, including, if available, information obtained through electronic identification means, relevant trust services or any other secure remote or electronic identification process, regulated, recognized, approved or accepted by the national authorities empowered by law, and copies of identification documents, the archive of accounts and primary documents, business correspondence, results of analysis and research, for a period of 5 years from the termination of the business relationship or from the date of an occasional transaction.

Hereby, confirm that the information presented is true and accurately reflects the Bank's policy aimed at preventing money laundering and terrorist financing.

Signature of the head of the financial institution

Full name and position of the head of the financial institution

Levon Khanikyan,
President of the Management Board, CEO

S.P. (Stamp Place)

Date

01.08.2025

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