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10.06.2024

№ 09-1-11/18500

To whom it may concern

## On AML/CFT measures

Notification about the measures on prevention of money laundering,  
counteraction to terrorist financing and financing of spread of weapons  
of mass destruction, system of sanctions compliance

Belgazprombank pays close attention to compliance with the legislation of the Republic of Belarus on prevention of money laundering, counteraction to terrorist financing and financing of spread of weapons of mass destruction (hereinafter referred to as "AML/CFT").

The Internal Control Rules in the sphere of prevention of money laundering, counteraction to terrorist financing and financing of spread of weapons of mass destruction (hereinafter referred to as the "Internal Control Rules") were developed within Belgazprombank and approved by the decision of its Management Board.

In accordance with the Internal Control Rules Belgazprombank has built a system of internal control to prevent the engagement of Belgazprombank in the process of money laundering, terrorist financing and financing of spread of weapons of mass destruction.

The system of internal control in the sphere of AML/CFT is operative at all the stages of financial transactions performance taking into account the risk-based approach and includes:

collection and examination of required data and documents to form the profile of a client's identity (identification), verification of a client's data, recording of the required data and documents into a client form, risk assessment of doing business with a client;

procedures for establishment of relations with politically exposed persons and their related persons, as well as enhanced due diligence of their transactions;

monitoring of financial transactions at the stages of preliminary, current and subsequent control in order to identify financial transactions connected with money laundering, terrorist financing and financing of spread of weapons of mass destruction;

procedure for refusal of establishing relations with clients, the order of suspension and termination of relations with clients, as well as the procedure for refusal of performing suspicious financial transactions if there is sufficient evidence that the client's financial transactions are related to money laundering, terrorist financing and financing of spread of weapons of mass destruction;

procedure for identification of persons whose transactions are subject to measures on freezing and (or) blocking;

freezing of funds and (or) blocking of financial transactions of persons involved in terrorist activity.

Belgazprombank:

refuses to carry out financial transactions of clients, as well as their representatives in case of their failure to submit documents (information) required for their identification in accordance with the legislation of the Republic of Belarus;

neither open nor maintain banking accounts for anonymous clients and clients with explicitly fictitious names or pseudonyms;

does not serve persons without their personal presence or presence of their representatives, except cases stipulated by the legislation of the Republic of Belarus.

Belgazprombank does not establish nor maintain relations with non-resident banks which do not have in the territories of the states where they are registered permanent governing bodies and are not members of a banking group (bank holding company).

Belgazprombank takes measures to prevent relations with non-resident banks whose accounts are used by banks which do not have in the territories of the states where they are registered permanent governing bodies and are not members of a banking group (bank holding company).

We hereby confirm that Belgazprombank:

strictly complies with the legislation of the Republic of Belarus in the sphere of AML/CFT;

is not engaged in the activities that contribute to money laundering, terrorist financing and financing of spread of weapons of mass destruction;

is not a «shell-bank», i.e. a financial institution which has no physical presence in any state, including in the state of its location specified in its statutory documents, and (or) which has no banking license issued by the authorized body of its location state, and (or) which does not have the staff comprising of at least one full-time employee;

employs officers responsible for the implementation of the measures in the sphere of AML/CFT;

neither uses nor intends to use its correspondent accounts for performing transactions of clients which are «shell-banks»;

consents to the provision of a copy of this notification to business partners and clients of the counterparty banks.

Belgazprombank has developed and maintains a comprehensive and robust system of sanctions compliance with the view of ensuring its compliance with the requirements of international sanctions restrictions and prohibitions.

Belgazprombank complies with the requirements of international sanctions restrictions and prohibitions to the extent applicable from the point of view of the existing requirements of the legislation of the Republic of Belarus.

Deputy Chairman of the  
Management Board

Iryna Antonava

Head of Compliance Control

Yauheni Sizikau

