the Wolfsberg Group

Financial Institution Name: BC "Moldindconbank" S.A. Location (Country) : Republic of Moldova

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	ويصورون والماري وللمدار الإراب والمساور والماروون
1	Full Legal Name	Commercial Bank "Moldindconbank" S.A.
2	Append a list of foreign branches which are covered by this questionnaire	The Bank does not have foreign branches
3	Full Legal (Registered) Address	38, Armeneasca str., MD-2012, Chisinau, Moldova
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	20.06,2001
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Moldova Stock Exchange, MD14MICB1008
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	9
7	% of the Entity's total shares composed of bearer shares	No bearer shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	National Bank of Moldova
11	Provide Legal Entity Identifier (LEI) if available	48510000JUIJ1GQT2P10
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Doverie-Obedinen Holding J.S.C. publicly traded on Bulgarian Stock Exchange ticker symbol; DUH

13	Jurisdiction of licensing authority and regulator of ultimate parent	Bulgaria
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yea
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 ii		
	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	no other business areas
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17		Greater triair \$500 million
	Confirm that all responses provided in the above Section are representative of all the LE's branches,	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section,	
2. PRODU	UCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	No
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures	Yes
	in place to identify downstream relationships with foreign banks?	
19 a1g		No
19 a1g 19 a1h	foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	
	foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
19 a1h	foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity aflow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may	NO .
191	then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 0	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
10 m1	Check cashing service	No
19 p1	If yes, state the applicable level of due diligence	Please select
19 p1a		No
19 p2	Wire transfers If yes, state the applicable level of due diligence	Please select
19 p2a		Yes
19 p3	Foreign currency conversion If yes, state the applicable level of due diligence	Due diligence
19 p3a		No.
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	The Entity does not provide any additional high risk products and services
20	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
2 AMI C	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j		Yes
221	I PEP Screening	168
	PEP Screening Risk Assessment	
22 k 22 l	Risk Assessment Sanctions	Yes Yes

22 m	Europiainus Antivitu Don-di	V
22 m	Suspicious Activity Reporting Training and Education	Yes
22 n	Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	Both form ventures and unite parties acting on benan of the Entity
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
45	If appropriate, provide any additional information/context to the answers in this section,	
	ATT A GANGTIONS DOLLOIS & PROCEDURES	
	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	Yes
	services to shell banks	
49 f	services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 f 49 g	Prohibit opening and keeping of accounts for	Yes

Outline the processed for establishing framedal critier in is is insufported relially supplicated analysis process and supplied in the processes of the proce			
terminating existing customer relationships due to financial or financ	49 i	issues/potentially suspicious activity identified by	Yes
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handle customers that were previously exited for financial crime reasons in they seek for restablish a relationship of sanctions, PEPs and Adverse Media/Negative News 49 n	49 k	crime reasons that applies across the entity,	Yes
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internal "walchillists" 51 High the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business a risk boundary around their business ? 51 Dees the Entity have record reterition procedures that comply with applicable laws? 51 a If Y, what is the retention period? 51 a If Y, what is the retention period? 52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a If N, Clarify which questions the difference's relate to and the branch's that this applies to. 52 a If N, Clarify which questions the difference's relate to and the branch's that this applies to. 53 If appropriate, provide any additional information to the answers in this section. 6, AML, CIT & SANCTIONS RISK ASSESSMENT 54 Dees the Entity's AML & CIT EVERA cover the therethirts components detailed below: 54 a Client Yes 55 Coses the Entity's AML & CIT EVERA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes 55 Coses the Entity's AML & CIT EVERA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes 55 Coses the Entity's AML & CIT EVERA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes 55 Coses and Entity Sanctions EVERA cover the controls of the control	49 m		Yes
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54 c Channel Yes 54 d Geography Yes 55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: 55 a Transaction Monitoring Yes 55 b Customer Due Diligence Yes 55 c PEP Identification Yes 55 d Transaction Screening Yes 55 d Transaction Screening Yes 55 e Name Screening against Adverse Media/Negative News 55 f Training and Education Yes 55 g Governance Yes 55 f Training and Education Yes 55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 57 a Client Yes 57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes	54 a	Client	Yes
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To a management information [168]	57 d 58 58 a 58 b 58 c	Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance List Management	Yes Yes

customers classified as high-risk entities. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes		
Section Training and Education Yes	Name Screening	Yes
Has the Entity's Sorticina PVPRA been completed in the last 12 months?	Transaction Screening	Yes
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## A Continue of the answers in this section. F. KYC, CDD and EDD		
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64	Expected activity	Yes
64 Product usage Yes 64 Purpose and nature of relationship Yes 64 Source of funds Yes 65 Are source of funds Yes 65 Are sent of the following identified; 65 Are act of the following identified; 65 Are sent of the following identified; 65 Are ultimate beneficial ownership Yes 65 The Authorised signatories (where applicable) Yes 65 Common Ves 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 67 a lifty, what factoriscriteria are used to determine the customer's risk classification? Select all that apply: 67 a1 Product Usage Yes 67 a2 Geography Yes 67 a3 Business Type/Industry Yes 67 a3 Business Type/Industry Yes 67 a4 Legal Entity bype Yes 67 a5 Adverse Information Yes 67 a6 Other (specify) 68 a1 If y, is this at Part of your KYC process? 68 a1 Trigger event Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other Yes 68 a4 Other Yes 68 a4 Other Yes 68 a4 Other Yes 68 a5 If yes, please specify "Other" 68 Banks first line employees, loan and loan risk department conduct periodic on-alter customers classified as high-risk emilies. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If y, is this at Conboarding Yes	Nature of business/employment	Yes
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Section		Yes
Are ultimate beneficial owners verified? Yes		
Authorised signatories (where applicable) Yes		
65 c Key controllers Yes		
Other relevant parties Yes		
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Does the due diligence process result in customers receiving a risk classification? Yes	What is the Entity's minimum (lowest) threshold	
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68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a4a If yes, please specify "Other" The Bank's first line employees, loan and loan risk department conduct periodic on-site vicustomers classified as high-risk entities. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes	Legal Entity type	Yes
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68 a4 Other Yes 68 a4a If yes, please specify "Other" The Bank's first line employees, loan and loan risk department conduct periodic on-site to customers classified as high-risk entities. 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 If Y, is this at: 69 a If Y, is this at: 69 a Onboarding Yes		
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69 a1 Onboarding Yes	screening customers for Adverse Media/Negative News?	Yes
I VVC ropping		
D3 47 V1 C IGHEWAH 169	KYC renewal	Yes
UJ AZ		Training and Education Has the Entity's Sanctions EWRA been completed in the last 12 months? If N, provide the date when the last Sanctions EWRA was completed. Confirm that all responses provided in the above Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. Does the Entity verify the identity of the customer? Do the Entity's policies and procedures set out when CDD must be completed, e.g., at the time of onboarding or within 30 days? Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: Customer identification Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth Are each of the following identified; Ultimate beneficial ownership Are ultimate beneficial owners verified? Authorised signatories (where applicable) Key controllers Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Product Usage Geography Business Type/Industry Legal Entity type Adverse Information Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other Other specify "Other"

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	103
	Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onhoarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Restricted
76 b	Respondent Banks	Restricted
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling cuslomers	Restricted
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	Restricted
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
	PEP Related	
76 p		Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	The restrictions are applied on establishing relationship with some categories of customers, when money laundering /financing terrorism risks are considered as high.
78	Does EDD require senior business management and/ or compliance approval?	Yes

W.O.	Time But I have the	
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	CS Ltd
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMI	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	V
	Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
03.0	FATE Recommendation 16	V
93 a		Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	'Law of preventing and combating money laundering and terrorist financing nr, 308 from 22,12,2017; National Bank of Moldova Regulation No, 200 of 09,08,2018 and other normative acts of National Bank of Moldova and local FIU, related to AML/CFT field
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Enlity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
97	If appropriate, provide any additional information/context to the answers in this section,	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	LexisNexisRiskSolutions
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing dota) of the motching configuration of the automated tool? (If 'Other' please explain in Question 110)	<1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions I ists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Cuslomer Data	Same day to 2 business days
107 Ь	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c 112 d	2nd Line of Defence 3rd Line of Defence	Yes
112 d 112 e	Third parties to which specific FCC activities have	Yes
	been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	166

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section	
40.001415	THE ACCUPANCE IS SHELL AND EXCEPTION	
12. QUALI 117	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Enlity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 [Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional Information/context to the answers in this section.	
14. FRAU	ID	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated learn responsible for preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BC "Moldindconbank" S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis

[Victor Cibotaru, First Deputy Chairman (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this cells of g CBUO and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

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