

Information about Anti-Money Laundering and Combating Financing of Terrorism

Russian laws define money laundering as financial operations made to give a lawful appearance to the possession, use or disposal of illegally obtained money or any other assets. Anti-money laundering challenges are tremendous, and potential threats exist in all corners of the world. Financial service entities, regulatory and law enforcement bodies work hard to prevent any attempt to use the global financial system for money laundering.

The main goal of CREDIT BANK OF MOSCOW (the "Bank") is to be a reliable partner for our customers, providing financial services promoting economic growth and progress.

The Bank's internal control system designed to combat money laundering, terrorism financing and proliferation of weapons of mass destruction ("AML/CFT/PWMD") is compliant with Federal Law No. 115-FZ dated 07.08.2001 "On Anti-Money Laundering and Combating Financing of Terrorism" and the Bank of Russia's regulations and recommendations.

The Bank's internal control system is built around three main stages:

Prevention. Designing and complying with a robust "Know Your Customer" programme serving as a framework for assessing customer risks using objective criteria of involvement in money laundering / terrorism financing and, based on the results of such assessment, deciding on customer treatment modes. These steps ensure concentration of our work on high risk customers.

Detection. Monitoring transactions to detect unusual or suspicious ones and/or atypical business models, and running enhanced due diligence on customers.

Reporting. Informing promptly the competent federal executive authority of any reportable transactions or activity.

The Bank has built a comprehensive and consistent framework of AML/CFT/PWMD measures. It has also designed and implements proper policies, processes and controls to prevent money laundering and other financial crimes against the Bank, its customers or stakeholders.

Acknowledging that banking products and services can be used as a tool for money laundering, financing of terrorism or proliferation of weapons of mass destruction, and being committed to full compliance with Russian laws, the Bank declares adherence to following principles in its activities:

- preventing the Bank's involvement in any financial operations intended for money laundering, financing of terrorism and proliferation of weapons of mass destruction;
- application of the Bank's right to refuse conclusion of bank account agreement/to refuse to conduct an operation/to terminate contractual relations with customers for AML/CFT/PWMD purposes. Informing the clients about the date and reasons for the refusal within 5 working days from the date of making the relevant decisions on the remote service system, and/or by mail, and / or when the Client applies to the Bank in person;
- complying with AML/CFT/PWMD laws and regulations;
- identifying customers, their representatives, beneficiaries and beneficial owners;
- carrying out "Know Your Customer" procedures;
- no bearer accounts;
- no accounts (deposits) for anonymous holders or those using assumed names (pseudonyms);
- no contractual relationships with any credit or financial institutions that do not take AML/CFT measures;
- no contractual relationships or dealings with any shell banks;

- informing promptly the competent federal executive authority (FSFM) of any reportable transactions or activity;
- cooperating with regulators and law enforcement bodies, supporting their efforts to prevent, detect and control financial crimes.

The Bank continuously evaluates its existing policies, procedures and technologies, and updates them whenever legal requirements change and as necessary to keep abreast of the changing environment. The Bank trains its staff regularly to increase their awareness and its confidence that they have all requisite skills to combat money laundering and other financial crimes.

Combating money laundering is a continuous and evolving process. We acknowledge that preventing money laundering and detecting attempts to finance terrorism or proliferation of weapons of mass destruction requires ongoing improvement of policies, procedures and technologies in order to keep up with sophisticated schemes deployed by wrongdoers.