



## БЕЛЗНЕСШЭКАНАМБАНК

## BELVNESHECONOMBANK

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Attn: Correspondent Banks

Re: Belvnesheconombank AML/CFT policies and procedures

Dear Colleagues,

In pursuance of the Belarus AML/CFT laws and regulations, Belvnesheconombank has implemented the following measures:

We have developed and adopted the Rules of Organizing AML/CFT Internal Controls (approved by Belvnesheconombank Management Board Resolution No. 88 of June 8, 2006 as amended and supplemented by Belvnesheconombank Management Board Resolution No. 28 of January 26, 2011).

We have put in place a program of comprehensive identification of personal customers, businesses and correspondent banks by conducting customer profiling. All documents submitted in the course of identification are placed in customer folders and updated as prescribed by the applicable law of Belarus. Based on customer information obtained in the course of identification and verification of customer details with due account for the nature of customer business/occupation and customer-generated transactions presenting heightened risks each customer is assigned an aggregate risk grade.

A mechanism has been implemented to suspend financial transactions should at least one of the parties thereto appear to be a person involved in terrorism or controlled by an individual/entity involved in terrorism.

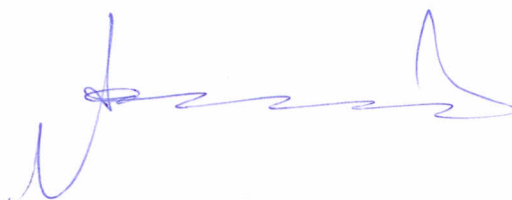
Procedures have been adopted and implemented with a view to detecting financial transactions subject to special control and their registering in special report forms to be submitted to the Financial Monitoring Department of the Belarus Committee of State Control. All such submitted report forms are retained in the Bank's e-document archives as prescribed by the Belarusian law. All documents relating to financial transactions subject to special control are retained

by Belvnesheconombank and its branches for five years from the date of the relevant transaction.

The Internal Audit Department exercises an ongoing monitoring of the compliance of the Bank's structural units with the internal control policies and procedures and national AML/CFT laws and regulations.

The Bank's staff is provided AML/CFT training.

Yours sincerely,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke, positioned to the right of the text 'Yours sincerely,'.

Dmitri P. Koulevatsky  
Deputy Chairman of the Management Board