

Joint-Stock Commercial Bank «NOVIKOMBANK»

AML POLICY

Is aimed at:

- Implementation of the state policy on combating legalization (money laundering) of illegally gained income and financing of terrorism in the banking sphere;
- Minimization of involvement of the Bank, its employees, affiliates, subsidiaries and affiliated companies in legalization (money laundering) of illegally gained income and financing of terrorism;
- Prevention of legal and reputation risks for the Bank as well as the risk of application of sanctions against the Bank by the regulatory authorities (up to revocation of the license for the performance of banking activity);
- Participation of the entire Bank's staff in combating legalization (money laundering) of illegally gained income and financing of terrorism.

With this purpose:

The rules of internal control of JSCB NOVIKOMBANK for the purposes of Combating Legalization (Money Laundering) of Illegally Gained Income and Financing of Terrorism (hereinafter - the Rules) were approved by the Chairman of the Management Board of Joint-Stock Commercial Bank «NOVIKOMBANK» and are being implemented in compliance with the requirements of Federal Law No. 115-FZ "On Combating Legalization (Money Laundering) of Illegally Gained Income and Financing of Terrorism" as of 07.08.2001 (with amendments and additions). The Rules are developed taking into account the requirements of actual rules and regulations, recommendations of regulatory authorities and international standards on combating legalization (money laundering) of illegally gained income and financing of terrorism and contain the following programs:

- Arrangement of work to combat legalization (money laundering) of illegally gained income and financing of terrorism;
- Identification of customers, their representatives and determination and identification of beneficiaries;
- Detection in the customers' activity of transactions subject to obligatory control and transactions with cash or other assets related to legalization (money laundering) of illegally gained income and financing of terrorism;
- Verification of information about the customers and their transactions in order to confirm or deny suspicions in respect of conducting legalization (money laundering) of illegally gained income and financing of terrorism by the customers;
- Education and training of the employees on combating legalization (money laundering) of illegally gained income and financing of terrorism;
- Implementation of the Federal Law provisions with regard to suspension of transactions with cash or other assets;
- Implementation of the Federal Law provisions that provide refusal to enter into bank account (deposit) agreements with individual and legal entities and refusal to perform the customer's order to carry out a transaction.

In compliance with the legislation requirements, Joint-Stock Commercial Bank «NOVIKOMBANK»:

- Doesn't open accounts (deposits) for anonymous customers, that is without the provision by the individual or legal entity opening the account (deposit) of the documents required for its identification;
- Doesn't open accounts (deposits) to individuals without physical presence of the person opening the account (deposit) or his representative;
- Doesn't establish or maintain relationships with non-resident banks without permanently functioning management bodies within the territory of the countries of registration.

Joint-Stock Commercial Bank «NOVIKOMBANK» has no beneficial owners (individuals) who directly or indirectly own more than 25% of shares in capital structure.

Linkages scheme between Bank and persons who have control or significant influence over Bank available on the website of the Central Bank of the Russian Federation .

A special Compliance Officer who is responsible for compliance with the mentioned rules and implementation of the specified programs is appointed in Joint-Stock Commercial Bank «NOVIKOMBANK».