



*On Measures Undertaken by Optima Bank OJSC for
Counteracting the Financing of Terrorist Activities and
Legalization (Laundering) of Criminal Proceeds (CFT/AML)*

We hereby inform you that, in accordance with the requirements of the following regulatory documents of the Kyrgyz Republic:

- ✓ Law of the Kyrgyz Republic No. 87 dated August 6, 2018, "On Counteracting the Financing of Terrorist Activities and Legalization (Laundering) of Criminal Proceeds";
- ✓ Resolution of the Government of the Kyrgyz Republic No. 606 dated December 25, 2018, "On Measures to Implement the Law of the Kyrgyz Republic 'On Counteracting the Financing of Terrorist Activities and Legalization (Laundering) of Criminal Proceeds' (CFT/AML)";
- ✓ Regulation of the National Bank of the Kyrgyz Republic No. 2019-P-12/42-1-(NPA) dated August 14, 2019, "On Minimum Requirements for the Organization of Internal Control in Commercial Banks for the Purpose of Counteracting the Financing of Terrorist Activities and Legalization (Laundering) of Criminal Proceeds";
- ✓ Instruction on Working with Bank Accounts and Deposit Accounts (Deposits) No. 41/12 dated October 31, 2012;
- ✓ Regulation on the Procedure for Conducting Customer Due Diligence, approved by Resolution of the Government of the Kyrgyz Republic No. 606 dated December 25, 2018.

Optima Bank OJSC has established a Compliance Control Department responsible for organizing the internal control system and ensuring compliance with the requirements set forth by the legislation of the Kyrgyz Republic on CFT/AML. Additionally, Optima Bank OJSC has approved and implemented the Policy on Counteracting the Financing of Terrorist Activities and Legalization (Laundering) of Criminal Proceeds.

The Policy mandates the implementation of the following measures within the Bank:

- ✓ Conducting proper customer due diligence, which includes:
 - Identification and verification of the client;
 - Identification of the beneficial owner and taking steps to verify the beneficial owner;
 - Obtaining information on the purpose and intended nature of the business relationship, as well as the source of the client's funds;
 - Verifying the source of the client's funds to ensure they are not proceeds of criminal activity;
 - Documenting the information obtained during the identification and verification of the client and beneficial owner;
 - Maintaining and updating information and documents on the client's activities and financial status, as well as information and documents obtained during the due diligence process.
 - Conducting ongoing analysis throughout the duration of the business relationship to ensure the transactions conducted by the client align with the available information about the client's activities, financial status, and the source of funds, as well as the nature of CFT/AML risks.

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- ✓ Applying the following measures in case of suspicions:
 - Refusing to establish a business relationship with the client (denying service or account opening);
 - Suspending or terminating the established business relationship with the client (refusing service, closing an existing account);
 - Not conducting a transaction.
- ✓ Providing continuous training to bank employees on CFT/AML matters;
- ✓ Conducting an assessment of banking products and services to identify those most susceptible to being used for CFT/AML purposes;
- ✓ Transmitting information on transactions subject to monitoring and reporting, as well as suspicious transactions, to the Financial Intelligence Service of the Kyrgyz Republic.

Furthermore, internal documents specify that Optima Bank OJSC:

- Does not open or maintain anonymous accounts;
- Does not establish or maintain correspondent relationships with banks:
 - That do not have a physical presence or any permanent management bodies in the countries where they are registered (shell banks);
 - With banks, their affiliates, subsidiaries, and separate divisions that are not independent legal entities registered in offshore zones;
 - Registered in foreign countries (territories) included in the list of states (territories) that do not comply with or insufficiently comply with FATF recommendations.
- Does not establish business relationships with clients if the client (or their representative/founder or beneficial owner) is included in the Consolidated Sanctions List of the Kyrgyz Republic, the UN Security Council Consolidated Sanctions List, or the sanctions lists of the EU, USA, and UK.
- Does not establish business relationships with companies/organizations controlled by entities or individuals included in the EU, US, and UK sanctions lists, where a sanctioned person owns 50% or more of shares/equity or otherwise exercises control.
- Refuses service/account opening/terminates established business relationships if the client fails to provide the necessary information or documents for conducting proper customer due diligence.
- Applies enhanced due diligence measures for high-risk clients and public officials, their family members, and close relatives.

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