

ANTI-MONEY LAUNDERING POLICY STATEMENT

Introduction

KDB Bank Uzbekistan JSC (“Bank”), a foreign subsidiary of Korea Development Bank, is committed to preventing money laundering and the financing of terrorism in compliance with both national and international standards.

The Bank has implemented the AML and Sanctions Program which consists of AML & Sanctions Policy and associated procedures (KYC; Transaction Monitoring and Reporting; Sanctions Screening; Risk Assessment Procedures; and other internal documents of the bank).

Our AML/CFT policy is designed to ensure that we uphold the highest standards of integrity and transparency in our operations.

This Statement is developed on the basis of the above-mentioned Policy and Procedures and applied to the KDB Bank Uzbekistan JSC and its Branch.

Compliance with Regulations

National Regulations:

We adhere to the requirements of Uzbekistan, including but not limited to:

- The Law of the Republic of Uzbekistan “On Combating the Legalization on Proceeds of Criminal activity, the Financing of Terrorism and the Financing of Proliferation of Weapons of Mass Destruction” #660-II dated 26 August 2004;
- The Rules of Internal Controls to Combat Money Laundering, Financing of Terrorism and the Financing of Proliferation of Weapons of Mass Destruction at Commercial Banks, registered by Ministry of Justice of the Republic of Uzbekistan under #2886 dd 23 May, 2017 (AML National Rule), and the relevant regulations issued by the Department for Combating Economic Crimes under the General Prosecutor's Office of the Republic of Uzbekistan (Local Financial Intelligence Unit – Local FIU).

International Standards

Our internal policy aligns with the international standards established by the Financial Action Task Force (FATF). We comply with the FATF Recommendations, which are recognized globally as the benchmark for effective AML/CFT measures. This includes:

- Implementing a risk-based approach to assess and mitigate the risks of money laundering and terrorist financing;
- Conducting customer due diligence (CDD) and enhanced due diligence (EDD) for higher-risk customers;
- Monitoring transactions and reporting suspicious activities to the appropriate authorities;
- Ensuring transparency and accountability in our financial dealings and record-keeping.
- Providing regular training to our employees to recognize and prevent potential money laundering and terrorist financing activities.

Verification of Customer Identity

To comply with the requirement, the Bank verifies customer identity prior to conducting any financial activities.

Use of Correspondent Accounts

Our internal policy stipulates that we do not make a correspondent relationship with a shell bank nor use any correspondent account to provide banking services directly or indirectly to any third parties (payable-through accounts).

Money Laundering Reporting Officer and Internal Control

To increase the efficiency of the bank's AML activities and to meet the terms of the AML laws and regulations of Uzbekistan, KDB Bank Uzbekistan JSC established its internal policies and appointed the Head of Compliance Department as Money Laundering Reporting Officer (MLRO). The MLRO is responsible for reporting money laundering activities to the Local Financial Intelligence Unit.

The Compliance Department runs the Enterprise-Wide Risk Assessment System to identify risk profiles and control factors and develop counter-measures to mitigate the evaluated ML/TF risks.

For the better supervision of our AML policies, our internal auditors are regularly carrying out internal audits on the AML operations., with a focus on the appropriateness and effectiveness of the bank's AML policies, procedures, and the monitoring system. The frequency of audits shall be conducted periodically, and additional audits may be applicable based on the risk profile of the Bank. Audit Department shall report on the audit findings and the remediations to the Supervisory Board as well as relevant stakeholders.

Suspicious Transaction Report (STR)

Report

In order to fulfill the Rules of Internal Control to Combat Money Laundering, Financing of Terrorism and the Financing of Proliferation of Weapons of Mass Destruction at Commercial Banks, registered by Ministry of Justice of the Republic of Uzbekistan under #2886 dd 23 May, 2017 (AML National Rule), KDB Bank Uzbekistan JSC reports suspicious transaction to the Local FIU if it has reasonable grounds to do so based on its expertise and subjective judgement. KDB Bank Uzbekistan JSC's internal reporting procedures require employees to report any suspicious transactions to the MLRO for review when a transaction appears to be utilized for illegal purposes or exhibits unusual patterns. If the MLRO deems that the reported transaction is suspicious, such transaction is reported to the Local FIU.

Monitoring

KDB Bank Uzbekistan JSC has established procedures for monitoring transactions and identifying suspicious activities. This includes:

- Automated Reporting tool for generation of reports with transactions determined by the set criteria of doubtful and suspicious transactions for transaction monitoring and analysis which enables effective detection of suspicious financial activities and prevents the bank's involvement in money laundering or terrorist financing activities;
- Reporting suspicious transactions to the Local FIU in accordance with regulatory requirements.

Furthermore, post-monitoring is programmed to be executed periodically so that the existing transactions can be re-censored entirely, ensuring the reliability of our anti-money laundering activities. In addition, employees can also file suspicious transaction reports without spotting any red flag indicator if there is reasonable suspicion concerning a transaction.

Currency Transaction Reporting System (CTR)

In accordance with The AML National Rule, cash transactions that equal to or exceeds the threshold amount are subject to reporting to the Local FIU.

By reporting all cash transactions that are equal to or more than set threshold amount, the Bank aims to help prevent the flow of illegal funds and regulate anomalous financial transactions.

Customer Due Diligence (CDD)

The bank implements robust CDD measures, including:

- Identifying and verifying the identity of customers and beneficial owners;
- Conducting ongoing monitoring of transactions and account activity;
- Applying enhanced due diligence for higher-risk customers and transactions.

For those customers who are considered high risk based on a risk-based scoring system, KDB Bank Uzbekistan JSC executes Enhanced Due Diligence (EDD) and checks additional information such as the purpose of transactions and the sources of funds to further ensure the legality of their transactions and prevent money laundering risks. The AML National Rule and our internal policy stipulates by default certain customers as high-risk group which includes correspondent banking customers, non-residents, Politically Exposed Persons, etc.

Employee Training Program

KDB Bank Uzbekistan JSC provides specialized AML/CFT training to all employees at least once a year to help increase their awareness and understandings of AML/CFT. All training courses of KDB are designed to include educational instructions on the bank's AML programs and policies and are delivered via in-class or cyber lectures as well as documents. The training programs also include current updates on AML laws and regulations and recent trends in money laundering, so that the employees can be aware of the new and current information. This information and updates are frequently distributed to the employees through regular training courses in order to keep them up to date with AML issues in a timely manner.

As for the staff of the AML team, they receive various training and are given opportunities to earn necessary certificates to improve their expertise and gain a broader perspective.

I, Lee, Young Lok certify that the information provided in the statement above is correct, accurate, and reflective of the Bank's policies, procedures, and programs on anti-money laundering, combating terrorist financing, and know your customer practices.

Joo Dong bin
Chairman of the Management Board

JINOIY FAOLIYATDAN OLINGAN DAROMADLARNI LEGALLASHTIRISHGA QARSHI KURASHISH YUZASIDAN BAYONOT

Kirish

Koreya Taraqqiyot Bankining xorijiy sho'ba korxonasi bo'lmish "KDB Bank O'zbekiston" AJ (keyingi o'rinlarda - Bank) ham milliy, ham xalqaro standartlarga muvofiq jinoiy faoliyatdan olingan daromadlarni legallashtirish va terrorizmni moliyalashtirishning oldini olishga doimiy ravishda intiladi.

Bank Jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurash (JFODLQ) va Sanksiyalar dasturi hamda tegishli tartib-qoidalardan (KYC, Tranzaksiya monitoringi va hisoboti, Sanksiyalarni tekshirish, Risklarni baholash tartib-qoidalari hamda bankning boshqa ichki hujjatlari) iborat bo'lgan JFODLQ va Sanksiyalar dasturini ishlab chiqqan.

JFODLQ/TM siyosati faoliyatimizda yaxlitlik va shaffoflikning eng yuqori standartlariga rioya qilishni ta'minlash maqsadida ishlab chiqilgan.

Ushbu Bayonot yuqorida qayd etilgan Siyosat va tartib-qoidalar asosida ishlab chiqilgan bo'lib, "KDB Bank O'zbekiston" AJ va uning filialiga nisbatan qo'llaniladi.

Qoidalarga muvofiqlik

Milliy qoidalar

Biz O'zbekiston Respublikasining quyidagi ro'yxatda keltirilgan hamda mazkur ro'yxat bilan cheklanmagan quyidagi qonun hujjatlari hamda me'yoriy hujjatlarning talablariga amal qilamiz:

- O'zbekiston Respublikasining "Jinoiy faoliyatdan olingan daromadlarni legallashtirishga, terrorizmni moliyalashtirishga va ommaviy qirg'in qurolini tarqatishni moliyalashtirishga qarshi kurashish to'g'risida"gi Qonuni;
- O'zbekiston Respublikasi Adliya vazirligi tomonidan 2017-yil 23-mayda 2886-son bilan ro'yxatdan o'tkazilgan "Tijorat banklarida jinoiy faoliyatdan olingan daromadlarni legallashtirishga, terrorizmni moliyalashtirishga va ommaviy qirg'in qurolini tarqatishni moliyalashtirishga qarshi kurashish bo'yicha ichki nazoratni amalga oshirish qoidalari" (keyingi o'rinlarda – JFODLQ qoidalari), O'zbekiston Respublikasi Bosh prokuraturasi huzuridagi Iqtisodiy jinoyatlarga qarshi kurashish departamenti (maxsus vakolatli davlat organi - MVDO) tomonidan qabul qilingan tegishli me'yoriy hujjatlar.

Xalqaro standartlar

Mazkur ichki siyosat jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish bo'yicha moliyaviy choralar ishlab chiquvchi guruh (FATF) tomonidan belgilangan xalqaro standartlarga mos ravishda ishlab chiqilgan. Biz global miqyosda JFODLQ/TM ga qarshi kurashishga doir samarali chora-tadbirlar uchun mezon sifatida tan olingan FATF tavsiyalariga amal qilamiz. Ushbu tavsiyalar quyidagilardan iborat:

- jinoiy faoliyatdan olingan daromadlarni legallashtirish va terrorizmni moliyalashtirish xavfini baholash va kamaytirish uchun tavakkalchilikka asoslangan yondashuvni joriy etish;

- rivojlanish darajasi yuqori bo'lgan mijozlarni lozim darajada tekshirish (CDD) va kuchaytirilgan lozim darajadagi tekshiruvni (EDD) amalga oshirish;
- operatsiyalarni monitoring qilish va shubhali harakatlar yuzasidan tegishli organlarni xabardor qilish;
- moliyaviy operatsiyalar va hisob yuritishlarda shaffoflik va javobgarlikni ta'minlash;
- xodimlar uchun jinoiy faoliyatdan olingan daromadlarni legallashtirish va terrorizmni moliyalashtirishni aniqlash hamda oldini olish bo'yicha muntazam ravishda treninglar o'tkazib borish.

Mijozning shaxsini tekshirish

Ushbu talabni bajarish uchun Bank har qanday moliyaviy operatsiyalarni amalga oshirishdan avval mijozning shaxsini tekshiradi.

Korrespondentlik hisobraqamlaridan foydalanish

Bank ichki siyosati shell banklari bilan korrespondentlik aloqalarini o'rnatmaslik va uchinchi shaxslarga bevosita yoki bilvosita bank xizmatlarini ko'rsatish uchun vakillik hisobraqamlaridan foydalanmaslikni belgilaydi (tranzit hisobvaraqlar).

Jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish yuzasidan hisobot beruvchi (mas'ul) xodim va ichki nazorat

Bankning JFODLQ/TM faoliyati samaradorligini oshirish hamda O'zbekiston Respublikasining JFODLQ/TM sohasidagi qonun hujjatlari va me'yoriy-huquqiy hujjatlari talablariga rioya etish maqsadida "KDB Bank O'zbekiston" AJ o'zining ichki siyosatiga ega bo'lgani holda, Komplayens boshqarmasi boshlig'i jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish yuzasidan hisobot beruvchi xodim etib tayinlangan. Ushbu xodim jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish yuzasidan maxsus vakolatli davlat organiga hisobot berish uchun mas'ul sanaladi.

Komplayens boshqarmasi risk profillari va nazorat omillarini aniqlash hamda baholangan ML/TF risklarini kamaytirishga qaratilgan choralarni ishlab chiqish uchun Bank miqyosidagi baholash tizimini boshqaradi.

"KDB Bank O'zbekiston" AJ JFODLQ siyosatini yanada yaxshiroq nazorat qilish maqsadida Bankning ichki auditorlari AML siyosati, nizomlari va monitoring tizimining maqsadga muvofiqligi hamda samaradorligiga e'tibor qaratgan holda, JFODLQ operatsiyalari yuzasidan muntazam ravishda ichki auditni amalga oshiradi. Auditorlik tekshiruvlari rejaga asoslangan holda o'tkaziladi va har qanday qo'shimcha tekshiruvlar Bankning risk profilidan kelib chiqqan holda amalga oshiriladi. Audit boshqarmasi audit natijalari va tuzatishlar yuzasidan Bank Kuzatuv kengashiga hamda tegishli manfaatdor tomonlarga hisobot taqdim qiladi.

Shubhali operatsiya hisoboti (STR)

Hisobot O'zbekiston Respublikasi Adliya vazirligi tomonidan 2017-yil 23-mayda 2886-son bilan ro'yxatdan o'tkazilgan "Jinoiy faoliyatdan olingan daromadlarni legallashtirishga, terrorizmni moliyalashtirishga va ommaviy qirg'in qurolini tarqatishni moliyalashtirishga qarshi kurashish bo'yicha ichki nazoratni amalga oshirish qoidalari"ning ijrosini ta'minlash maqsadida "KDB Bank O'zbekiston" AJ shubhali operatsiya yuzasidano'z ekspertizasi va sub'ektiv mulohazasiga asoslangan dalillarga ega bo'lgan taqdirda, MVDO ga xabar beradi. "KDB Bank O'zbekiston" AJ ichki hisobot berish tartib-qoidalariga muvofiq, tranzaksiya

noqonuniy maqsadlarda amalga oshirilgan yohud noodatiy holatlar mavjud bo'lgan taqdirda, xodimlar har qanday shubhali operatsiyalar yuzasidan ko'rib chiqish uchun jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish yuzasidan hisobot beruvchi xodimga xabar berishlari kerak. Agar jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish yuzasidan hisobot beruvchi xodim xabar qilingan operatsiyani shubhali deb hisoblasa, bunday operatsiya haqida MVDO ga xabar beriladi.

Monitoring

“KDB Bank O‘zbekiston” AJ operatsiyalarni kuzatish va shubhali faoliyatni aniqlash tartiblarini joriy etgan. Bunga quyidagilar kiradi:

- Shubhali va gumonli operatsiyalarning belgilangan mezonlari bo'yicha aniqlangan operatsiyalar bo'yicha hisobotlarni shakllantirish uchun, shubhali moliyaviy faoliyatni samarali aniqlash imkonini beruvchi hamda bankning jinoiy faoliyatdan olingan daromadlarni legallashtirish yohud terrorizmni moliyalashtirish faoliyatiga qo'shilishiga yo'l qo'ymaydigan operatsiyalarni monitoring va tahlil qilish uchun avtomatlashtirilgan hisobot vositasi;
- Normativ talablarga muvofiq shubhali operatsiyalar yuzasidan MVDO ga xabar berish.

Bundan tashqari, post-monitoring davriy ravishda amalga oshirilishi uchun dasturlashtirilgan bo'lib, mavjud operatsiyalar to'liq qayta tekshuruvdan o'tkazilishi mumkinligi jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi faoliyatimizning ishonchliligini ta'minlaydi. Bundan tashqari, agar operatsiyaga nisbatan asosli shubha mavjud bo'lsa, xodimlar hech qanday qizil bayroq ko'rsatkichini aniqlamasdan shubhali operatsiya hisobotlarini topshirishlari mumkin.

Valyuta operatsiyalari bo'yicha hisobot tizimi (CTR)

JFODLQ qoidalariga muvofiq, belgilangan miqdorga teng yoki undan yuqori miqdorda bo'lgan naqd pul operatsiyalari bo'yicha MVDO ga hisobot berilishi zarur. Belgilangan miqdorga teng yoki undan ortiq miqdordagi barcha naqd pul operatsiyalari yuzasidan hisobot berish orqali Bank noqonuniy mablag'lar oqimining oldi olinishi va anomal moliyaviy operatsiyalarning tartibga solinishiga yordam beradi.

Mijozlarni tekshirish (CDD)

Bank CDD bo'yicha qattiq chora-tadbirlarni amalga oshiradi, jumladan:

- mijozlar va benefitsiar egalarining shaxsini aniqlash va tekshirish;
- operatsiyalar va hisobraqamlar bo'yicha doimiy monitoring olib borish;
- yuqori xatarga ega deb hisoblangan mijozlar va operatsiyalar bo'yicha kengaytirilgan tekshiruvni amalga oshirish.

Riskka asoslangan skoring tizimi asosida yuqori xatarga ega deb hisoblangan mijozlar operatsiyalarining qonuniyligini ta'minlash uchun “KDB Bank O‘zbekiston” AJ Kuchaytirilgan lozim darajadagi tekshiruv (EDD) ni amalga oshiradi hamda operatsiyalarning maqsadi va mablag'lar manbalari singari qo'shimcha ma'lumotlarni tekshiradi. JFODLQ qoidalari va bizning ichki siyosatimizga asosan o'z-o'zidan ayrim mijozlarni yuqori xatar guruhiga mansubligini belgilagan holda, ularning qatoriga korrespondent bank mijozlari, norezidentlar, yuqori mansabdor shaxslar va boshqalar kiritiladi.

Xodimlarni o'qitish dasturi

“KDB Bank O‘zbekiston” AJ barcha xodimlarning JFODLQ/TM bo'yicha xabardorligi va tushunchalarini oshirishga ko'maklashish maqsadida yilda kamida bir marta maxsus treninglar o'tkazadi. Barcha treninglar bankning JFODLQ qonun va qoidalari bo'yicha hamda jinoiy

faoliyatdan olingan daromadlarni legallashtirish yoki terrorizmni moliyalashtirish sohasidagi so'nggi tendensiyalarini o'z ichiga olgan holda ishlab chiqilgan bo'lib, onlayn yoki offlayn shaklda o'tkaziladi.

JFODLQ bo'linmasi xodimlariga ham turli xil o'quv dasturlarida qatnashish orqali o'z malakalarini muntazam ravishda oshirish imkoniyati taqdim etiladi.

Men, Li, Yong Lok, yuqoridagi bayonotda keltirilgan ma'lumotlar to'g'ri, aniq va Bankning jinoiy daromadlarni legallashtirishga, terrorizmni moliyalashtirishga qarshi kurashish siyosati, boshqa ichki hujjatlari va dasturlariga hamda "O'z mijozingizni biling" amaliyotini aks ettirishini tasdiqlayman.

Yong Lok Li
Boshqaruv raisi