



KDB Bank Uzbekistan
SANCTIONS POLICY STATEMENT

Sanctions regime refers to the laws and regulations related to financial and economic Sanctions enforced by relevant governments and international organizations consisting of restrictions and prohibitions on transactions with certain countries, entities, individuals and industries.

The Sanctions statement (the “Statement”) of KDB Bank Uzbekistan JSC and its branch, each hereafter referred to collectively as the Bank, is a statement that is designed to ensure to comply with all applicable economic sanctions laws that are binding upon regulatory instructions the Bank and its business.

To this end, the Bank has developed Sanctions Compliance Program (the “SCP”) through a risk-based approach. Sanctions Compliance Program is designed to protect the Bank from being used to provide financial services and facilitate transactions involving sanctioned parties, and to govern its compliance with Sanctions regimes impacting the Bank.

The primary objectives of the Statement are:

- To establish a consistent standard to effectively manage sanctions compliance risk;
- Be applicable to all business areas and employees throughout the Bank, and all products, services, and delivery channels offered by the Bank; and
- To comply with the Sanctions laws and regulations in line with Sanctions restrictions enacted by the UN, the EU, the US, the UK, the Republic of Korea, and the Department for Combating Economic Crimes under the General Prosecutor's Office of the Republic of Uzbekistan (Local Financial Intelligence Unit – Local FIU) through an effective risk-based approach. In addition, through such efforts, the Bank seeks to manage legal, compliance, regulation, and reputational risks across the Bank and mitigate such risks to prevent from any violation of applicable Sanctions laws and regulations.

Our SCP adopts strict prohibitions and/or restrictions of compliance with sanctions laws and regulations. As such, the Bank may not able to facilitate business activity or transactions that relate to certain individuals, entities, industries sector (including but not limited to military-industrial base, any specific industrial sector) pursuant applicable Sanctions and Export Control Laws or jurisdictions even if that activity is not locally prohibited. In this regard unless permitted by law or by an appropriate, valid government-issued permit or license, the Bank does not provide financial services in connection with the following Entity/Individual, and Country/Territory/Government:

- Persons (individuals or entities) named on certain sanctions lists issued by the UN, EU, US, ROK, UK, and other applicable sanctions regime;
- Persons (individuals or entities), which are directly or indirectly 50% or more owned individually or in the aggregate or controlled by any of the persons indicated above;
- Parties named on a sanctions list issued by the competent authority in the jurisdiction in which KDB operates;
- Persons, whose ownership percentage is less than 50% individually or in the aggregate or otherwise controlled by Sanctioned persons, that are deemed and treated as Sanctioned persons by the Bank;

- Persons, who are suspected to be engaging in sanctions evasion or conduct that will likely result in or materially contribute to sanctions evasion by the Bank;
- Iran – the Bank does not undertake any transaction involving Iran, any party in Iran, or Government of Iran;
- North Korea – the Bank does not undertake any transaction involving North Korea, any party in North Korea, or Government of North Korea;
- Russia and Belarus – the Bank does not undertake any transaction involving any individual, entity, or activity sanctioned under UN, EU, US, ROK, or UK economic sanctions on Russia and Belarus;
- Syria – the Bank does not undertake any transaction involving Syria, any party in Syria, or Government of Syria;
- Ukraine – the Bank does not undertake any transaction involving Crimea, or regions of Luhansk and Donetsk, the areas of the Kherson and the Zaporizhzhia regions or any party in the five aforementioned regions;
- Venezuela – the Bank does not undertake any transaction related to the provision of financing for or any other dealing involving the Venezuelan Government, including entities owned or controlled by the Venezuelan Government;
- Cuba and the Government of Cuba – the Bank does not undertake any transaction that has a US nexus (that is, the US financial system, US persons or US origin goods).
- The Government of Zimbabwe.

The foregoing list is demonstrative, that the Bank has processes to conduct additional due diligence on and seeks clarifications of the particular transaction parties involved to respond to and comply with changes in laws and regulations.

In complying with applicable Sanctions Laws and Regulations or the SCP, the processing of customer transactions may be delayed while KDB Bank Uzbekistan JSC conducts additional due diligence on and seeks clarifications of the underlying transactions and/or the parties involved.

The Bank also may decide not to process transactions, provide products or services or otherwise facilitate transactions even where permitted by applicable sanctions laws and regulations where these activities fall outside of the Bank's sanctions risk appetite.

The Bank may change the prohibitions described here without notice at any time. If you have any queries in relation to the Bank's policy position in relation to sanctions, please contact your Relationship Manager.

SANKSIYALAR SIYOSATI YUZASIDAN BAYONOT

Sanksiyalar rejimi, muayyan hukumatlar va xalqaro tashkilotlar tomonidan ijro etiladigan moliyaviy va iqtisodiy sanksiyalarga oid qonunlar va qoidalarga ishora qiladi, bunda ayrim davlatlar, tashkilotlar, shaxslar va sanoat bilan tuzilgan bitimlarga nisbatan cheklov va ta'qiqlar qo'llaniladi.

KDB Bank O'zbekiston AJ va uning filiali (keying o'rinlarda - Bank) sanksiyalar bayonoti (keying o'rinlarda Bayonot) Bank va uning biznesi uchun majburiy bo'lgan barcha iqtisodiy sanksiyaviy qonunlarga rioya qilishni ta'minlashga qaratilgan bayonotdir.

Shu maqsadda, Bankning tavakkalchilikka asoslangan yondashuv orqali Sanksiyalarga rioya qilish dasturi (keying o'rinlarda - SRD) ishlab chiqilgan. Sanksiyalarga rioya qilish dasturi Bankni sanksiyaga uchragan tomonlar bilan moliyaviy xizmatlar ko'rsatish va operatsiyalarni amalga oshirishda bank xizmatlaridan foydalanilishidan himoya qilish va Bankka ta'sir ko'rsatadigan sanksiyaviy rejimlariga rioya qilishni boshqarishga qaratilgan.

Bayonotning asosiy maqsadlari quyidagilardan iborat:

- Sanksiyalarga rioya qilish xatarlarni samarali boshqarishning muvofiqlashtirilgan standartni o'rnatish;
- Bankning barcha biznes sohalari va xodimlariga, shuningdek Bank tomonidan taklif etilayotgan barcha mahsulotlar, xizmatlar va yetkazib berish kanallariga nisbatan qo'llanilishi; va
- BMT, YEIning, AQSh, Buyuk Britaniya, Koreya Respublikasi va O'zbekiston Respublikasi Bosh prokuraturasi huzuridagi Iqtisodiy jinoyatlarga qarshi kurashish departamenti (maxsus vakolatli davlat organi - MVDO) tomonidan qabul qilingan sanksiyaviy cheklovlarga muvofiq sanksiyaviy qonunlar va qoidalarga rioya qilish. Shu bilan birga, bunday sa'y-harakatlar orqali Bank o'z faoliyatida huquqiy, komplayens, tartibga solish va bank obro'-e'tibori bilan bog'liq xatarlarni boshqarishni ko'zlaydi hamda bunday xatarlarni bartaraf etishga intiladi.

Bank sanksiyalarga rioya qilish dasturi uchun qo'llaniladigan qonuniy talablarga va Bankning sanksiyaviy xatarlariga mos keladigan qo'shimcha ichki nazorat choralarini joriy qilishi mumkin.

Bizning SRD sanksiyaviy qonun va qoidalarga muvofiq bo'lmish qat'iy ta'qiq va/yoki cheklovlarni o'z ichiga oladi. Shu sababli, ayrim shaxslar, tashkilotlar, sanoat sektorlari (harbiy-sanoatga yohud har qanday maxsus sanoat sohalari mazkur tutilgan bo'lib, ushbu ro'yxat yakuniy hisoblanmaydi)ga aloqador biznes faoliyati yoki operatsiyalarni amalga oshirish mahalliy darajada taqiqlanmagan bo'lsa ham, Bank bunday faoliyatlar yuzasidan bank xizmatlarini taqdim qila olmasligi mumkin. Shu nuqtai-nazardan, agar qonun yoki hukumat tomonidan berilgan tegishli ruxsatnoma yoki litsenziya bilan ruxsat etilgan bo'lmasa, Bank quyidagi tashkilot/shaxslar va mamlakat/hudud/hukumat bilan bog'liq holda moliyaviy xizmatlar ko'rsatmasligini e'tiborga olishingiz so'raladi:

- BMT, YEI, AQSH, Koreya Respublikasi, Buyuk Britaniya tomonidan tuzilgan ayrim sanksiyalar ro'yxatiga kiritilgan shaxslar (jismoniy yoki yuridik shaxslar), shuningdek boshqa amaldagi sanksiyalar;
- yuqorida ko'rsatilgan shaxslar tomonidan bevosita yohud bilvosita individual ravishda yoki yig'indisi 50% yohud undan ko'p ulushga egalik qiluvchi jismoniy yoki yuridik shaxslar;
- KDB o'z faoliyatini amalga oshiradigan yurisdiksiyalardagi vakolatli organlar tomonidan tuzilgan sanksiyaviy ro'yxatlarga kiritilgan Taraflar;
- egalik qiluvchi ulushi individual ravishda yoki yig'indisi 50% dan kam bo'lgan yohud Sanksiyaga uchragan shaxslar tomonidan boshqa tarzda nazorat qilinadigan shaxslar, ular Bank tomonidan Sanksiyaga uchragan shaxslar sifatida ko'riladi;
- sanksiyalarni chetlab o'tish bilan shug'ullanish yoki Bank tomonidan sanksiyalarni chetlab o'tishga olib keladigan harakatlarni amalga oshirishda gumon qilinayotgan shaxslar;

- Eron - Bank Eron bilan, Eron tarafidagi har qanday tomon yoki Eron hukumati bilan bog'liq operatsiyalarni amalga oshirmaydi;
- Shimoliy Koreya - Bank Shimoliy Koreya bilan, Shimoliy Koreya tarafidagi har qanday tomon yoki Shimoliy Koreya hukumati bilan bog'liq operatsiyalarni amalga oshirmaydi;
- Rossiya va Belarus - Bank BMT, YEI, AQSh, Koreya Respublikasining sanksiyalari yohud Buyuk Britaniyaning iqtisodiy sanksiyalari qo'llanilgan har qanday shaxs, tashkilot yoki faoliyat bilan bog'liq operatsiyalarni amalga oshirmaydi;
- Suriya - Bank Suriya bilan, Suriya tarafidagi har qanday tomon yoki Suriya hukumati bilan bog'liq operatsiyalarni amalga oshirmaydi;
- Ukraina - Bank Qrim, Lugansk va Donesk viloyatlari, Xerson va Zaporozhye viloyatlari yoki yuqorida ko'rsatilgan beshta ma'muriy-hududiy bo'linma bilan bog'liq hech qanday operatsiyalarni amalga oshirmaydi;
- Venesuela - Bank Venesuela hukumati yoki Venesuela hukumati tomonidan nazorat qilinadigan tashkilotlar bilan bog'liq operatsiyalarni amalga oshirmaydi;
- Kuba va Kuba hukumati - Bank AQSh bilan aloqaga ega bo'lgan har qanday tranzaksiyani (ya'ni, AQSh moliya tizimi, AQSH shaxslari yoki AQShdan kelib chiqqan tovarlar) amalga oshirmaydi;
- Zimbabve hukumati.

Yuqoridagi ro'yxat namuna sifatida keltirilgan bo'lib, Bank qo'shimcha ravishda lozim darajada tekshirish jarayonlarini amalga oshiradi va qonun hamda qoidalarining o'zgarishlariga javoban va ularni bajarish uchun ma'lum operatsiya taraflari haqida aniqlik kiritadi.

Bankning Sanksiyalarga doir risk-appetitidan to'liq chetga chiqilgan hollarda, amaldagi sanksiyalar to'g'risidagi qonunlar va qoidalar bilan ruxsat etilgan tovarlar yoki xizmatlar Bank tomonidan ko'rsatilmasligi yohud operatsiyalar boshqacha tarzda kechiktirilishi ham mumkin.

Bank ushbu bayonotda keltirilgan ta'qiqlarni har qanday vaqtda ogohlantirishlarsiz o'zgartirishi mumkin. Agar Sizda Bankning sanksiyalar bo'yicha siyosati yuzasidan savollaringiz bo'lsa, o'zingizning Mijozlar bo'yicha menejeringizga murojaat qilishingiz so'raladi.