

Compliance Questionnaire

I. General information

I.1 Full legal name of the Institution	O.C.N. "BT LEASING MD" S.R.L.
I.2 Registered Address	60/2 A. Puskin street, Chisinau, Republic of Moldova
I.3 Date of establishment	11.09.2008
I.4 Type of Entity:	MFI <input type="checkbox"/> Leasing <input checked="" type="checkbox"/> Other (specify):
I.5 The person responsible for the anti-money laundering / anti-corruption / anti-fraud policy	Craciunas Marius-Calin - CEO
I.6 The latest information about shareholders holding 10% or more of institution's shares / controlling interest	The 100% shareholder of BT Leasing MD is Banca Transilvania - a joint-stock company listed on the Bucharest Stock Exchange.
I.7 The list of members of Management and Board of Directors. Do any PEPs occupy roles in Management and/or Board of Directors?	Craciunas Marius-Calin – CEO (non-PEP); Plesuvescu Bogdan - President of the Board of Directors (non-PEP); Morar Ionut-Calin – Member of the Board of Directors (non-PEP); Turcan Roman - Member of the Board of Directors (non-PEP).

II. Regulatory Environment

II.1 Has your country established laws designed to prevent corruption, money laundering and terrorist financing and is your Institution subject to such laws?	Law no. 308 of 12-22-2017 is the one that transposes into the legislation of the Republic of Moldova the provisions of the EU directives and the requirements of the international standards adopted by the FATF.
II.2 Has the country of registration been identified by FATF as a country with strategic AML deficiencies?	No
II.3 Name of regulatory authority on AML/CFT matters	OFFICE FOR PREVENTION AND FIGHT AGAINST MONEY LAUNDERING
II.4 Do the laws in your country allow you to make transactions on anonymous basis?	No
II.5 Do you have foreign branches or subsidiaries? If yes, please list the countries where your subsidiaries or branches are located.	No

II.6 If answered “yes” to question II.5, are foreign branches or subsidiaries subject to anti-money laundering laws applicable to head office, and to AML/CFT policies of the head office? Please, state relevant regulatory bodies in respective countries.

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II.7 Is your Institution part of a Group? If yes, please specify the Group and country Group is located in.

BT Leasing MD is part of the Banca Transilvania Financial Group located in Romania.

III. Institution’s AML/CFT, ABC and Anti-Fraud policies and practices

III.1 Does your Institution have an AML/CFT Compliance Program approved by the Board or senior committee, which is in line with the requirements of the law, the regulator and the AML/CFT authority?

Yes, BT Leasing MD has an AML/CFT Compliance Program approved by the Board of Directors.

III.2 Does your Institution have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?

Yes, the officer that is responsible for coordinating and overseeing the AML framework is the CEO of the BT Leasing MD.

III.3 Are your AML/CFT policies and procedures compliant with the latest requirements of the applicable law? And FATF recommendations?

Yes, our policies and procedures are compliant with the latest requirements of the law no 308/2017 and the FATF recommendations.

III.4 Does AML/CFT policies of your Institution include:

- customer identification requirements at inception of the relationship?	Yes
- clearly defined roles and responsibilities for money laundering compliance?	Yes
- compliance with local suspicious activity reporting requirements?	Yes
- procedures for monitoring large transactions? If yes, what is the threshold?	BT Leasing MD monitors transactions over 200 000 MDL.
- record retention requirements for customer identification documentation in accordance with the local law?	Yes
- policy and procedures for independent audit or testing of your AML/CFT compliance program?	Yes

III.5 When does the institution update its AML policies?

BT Leasing MD's KYC/AML/CFT policies and procedures are reviewed at least annually to ensure compliance with current legislation or as a result of changes to the Group's policies.

III.6 In addition to inspections by the government supervisors / regulators, does your Institution have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?

Yes, the Internal Audit Department of Banca Transilvania evaluates the risks regarding the compliance area.

III.7 Does your Institution have a risk-based assessment of its customer base, or third-party due diligence system?

Yes, BT Leasing MD annually evaluates the customer base through the lens of AML/CFT risks, and the results are reported to the Board of Directors.

III.8.a Does your Institution provides services to the following types of customers

- offshore banks	No
- shell banks	No
- gambling institutions	No
- politically exposed persons	Yes
- pawn shops, money value transfer services and other cash-intensive businesses	Yes
- non-resident individuals *	Yes

*BT Leasing MD finance only non-resident customers who have identity documents issued by Moldovan authorities.

III.8.b If in the previous question you've answered 'YES' to any of the items, does your Institution have the policies and procedures on managing the associated risks? Please describe core risk-mitigating features.

Yes, the internal procedures have AML risk management measures for politically exposed persons, clients with cash-intensive businesses and non-residents with ties (domicile, residence) to countries with high AML risk.

1. These customers are classified in the high-risk class with the application of increased precautionary measures;
2. The initiation or continuation of business relationships are approved by the CEO;
3. Annual updating of the identification data of the clients and of the beneficial owners;
4. Obtaining additional information about the clients (type of activity, source of funds, volume of assets, turnover etc.).

BT Leasing MD does not accept to establish business relationships with individuals or clients who have their domicile/headquarters in countries listed in KYC/AML/CFT Internal Procedure.

III.9 Has your Institution implemented processes for the identification of the third parties with whom it conducts transactions?

Yes

III.10 Does your Institution have a requirement to collect information regarding its customers' business activities?

Yes

III.11 Does you Institution have a written policy to ensure that reasonable measures are taken to obtain information about the identity of customers and beneficial owners ("Know Your Customer" information)?

Yes

III.12a Does your Institution have an automated transaction screening mechanism covering suspicious transactions, local sanctions and embargos, and local regulatory 'blacklist'?

The active customer portfolio of BT Leasing MD is checked daily on existing lists in the WORLD CHECK application (International Sanctions and PEP files).

At the same time, in order to comply with the international restrictive measures, the company complies with the decisions of the Interinstitutional Supervisory Board.

The Risk Department ensures the observance of the Orders of the Information and Security Service of the Republic of Moldova, as well as receives notifications about the addition of new persons/entities to the List of persons, in, groups and entities involved in terrorist activities issued by the Information and Security Service of the Republic of Moldova, which allow effective monitoring of the client portfolio.
BTL MD employees apply customer knowledge measures and, if it finds that an operation or several operations carried out or to be carried out by a client are suspicious (the operations would concern money laundering or the financing of terrorism), they will immediately notify the officer that is responsible for coordinating and overseeing the AML framework and the person responsible for interacting with the authority for the prevention of money laundering.

III.12b Does your Institution have an automated screening mechanism covering sanctions of

- OFAC	-
- EU	Yes
- UN	Yes

III.13 An existing AML framework prescribes that a politically exposed person (PEP) status of the client/client's beneficial owner automatically triggers

- high risk category	Yes
- enhanced due diligence	Yes
- top management approval to engage into relationship	Yes

III.14 Does your Institution deliver entry and periodical AML/CFT, Anti-Fraud and ABC trainings to relevant staff? If yes, what is the frequency of such trainings.

According to the Internal Training Plan for the staff with KYC/AML responsibilities, BT Leasing MD employees are trained every six months. Initial training of new employees is carried out within 30 days of employment.
At the same time, the personnel responsible for the implementation and adaptation of the internal regulations to the legal requirements participate in external trainings such as those organized by the Banca Transilvania, the Romanian Banking Institute, the National Bank of Moldova, the Office for Prevention and Fight Against Money Laundering, etc. Moreover, at least once a year, BT Leasing MD in collaboration with the Compliance Department of Banca Transilvania organizes Anti-Fraud and ABC trainings for the relevant employees.
In accordance with the Annual Compliance Program, BT Leasing MD employees are regularly trained on topics specific to the area of compliance: anti-fraud, conflicts of interest, anti-corruption, code of conduct, etc.

III.15 Does your Institution communicate new AML related laws or changes to existing AML/CFT, ABC and Anti-Fraud related policies or practices to relevant employees?

According to the internal procedures, the Head of the legal service is the person responsible for informing the employees involved in the application of the AML legislation about the changes made in the legislation related to this field.

III.16 Does your Institution employ third parties to carry out some of the AML/CFT Compliance functions of the Institution? If yes, please provide details. Does the Institution provide AML/CFT training to and conducts oversight over such third parties?

No

III.17 Has your Institution been subject to criminal enforcements from authorities in recent 5 years?

No



III.18 Has your Institution or its management or AML/ABC-responsible person been subject to investigation, conviction, indictment, civil or regulatory action related to AML/ABC in recent 5 years?

No

III.19 Has your Institution been fined for AML/CFT related issues in the last 5 years? If yes, please provide details on the fine justification and follow up actions.

No

Signed by Craciunas Marius-Calin, CEO
