

AML, CFT & KYC Policy Statement

Vietbank is committed to fully complying with various laws, directions and regulatory guidance on AML in force in Vietnam and effective AML standards recommended by FATF.

As a bank doing business in Vietnam, we are regulated by the State Bank of Vietnam (“SBV”) and subject to AML supervisions from the Department of AML under the Inspection Agency which is an arm of SBV.

Vietbank has established an Anti-Money Laundering Program (“AML Program”) for this purpose. The objective of the AML Program is to ensure that money laundering risks identified by us are appropriately mitigated. This is achieved by establishing: Board-approved policies, principles; and implementing appropriate controls, to protect Vietbank, its employees, shareholders, and customers from money laundering. The AML Program provides guidance to all Vietbank employees, requiring them to conduct business in accordance with applicable AML laws, rules, and regulations.

The Program includes but is not limited to:

- The appointment of an Anti Money Laundering Officer as required by SBV;
- A Customer Due Diligence (“CDD”) Program which incorporates Customer Identification and Verification and Know Your Customer (“KYC”) principles, and the implementing of programs designed to appropriately remediate CDD of our existing customers;
- Clients’ personal information and evidence of identity and business relations shall be maintained for a minimum period of five years;
- Vietbank classify Customers into 3 (three) risk levels: “Low”, “Moderate” and “High”. Before (i) opening accounts at the first time including payment account, saving account, card account and other account types or (ii) providing any products or services at the first time, staff in charge requires to classify risk levels of Customers based on type of Customers, type of products or services which clients use including those anticipated using, place of residence or location of headquarter of the Customers to determine the

measures of due diligence and transaction monitoring. All criteria will be reviewed annually;

- Conducting enhanced due diligence (“EDD”) on higher risk customers, such as Politically Exposed Persons (“PEPs”);
- Establishing processes and systems designed to monitor customer transactions in order to detecting suspicious activities. Alerts are generated on breaching any set scenarios/thresholds;
- The investigation and subsequent reporting of suspicious activity to SBV;
- Periodic training is provided to all Staff members at least annually; relevant new employees are given AML/CFT training within six months of joining the bank;
- Annually our Internal Audit also monitors the compliance, reviews internal regulations, procedures related to AML over whole system and suggests the enhancement (if necessary).
- The prohibition of the following products, services and customer types: anonymous accounts or customers seeking to maintain an account in an obviously fictitious name; shell banks; payable-through-accounts, and relevant additional local requirements;
- We observe and adhere to sanctions imposed by UN, EU, OFAC and lists provided by SBV.
- Vietbank has invested AML Systems from reputable vendors for Due Diligence Screening (before Client Acceptance), automated transaction monitoring from AML perspective as well as swift/payment screening from financial crimes’ perspective. The payment screening system scans payment messages in the live environment against applicable regulatory/economic sanctions/embargo lists, including but not limited to OFAC, UN, EU to ensure no customer or counterparty is in violation of any sanctions requirements.