

APPROVED
Director's order
LLC «BFB Capital»
«16» November 2018

**Internal control rules
in the field of preventing money laundering, financing terrorist activities and financing the
proliferation of weapons of mass destruction
in LLC «BFB Capital»**

Minsk
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I. General provisions

1. These Internal Control Rules in the field of preventing money laundering, financing terrorist activities and financing the proliferation of weapons of mass destruction at BFB Capital LLC (hereinafter referred to as the Internal Control Rules) are developed on the basis of the following regulatory legal acts:

- The Law of the Republic of Belarus of June 30, 2014 No. 165-3 "On measures to prevent legalization of proceeds from crime, financing of terrorist activities and financing the proliferation of weapons of mass destruction" (hereinafter - Law No. 165-3);
- Instructions on the requirements for the rules of internal control of leasing organizations, microfinance organizations, including pawnshops, in terms of their activities to attract and provide microloans, forex companies, the National Forex Center, banks and non-bank financial organizations in terms of their activities on the performance of transactions initiated by individuals and legal entities with non-deliverable over-the-counter financial instruments in the field of preventing money laundering, financing terrorist activities and financing weapons of mass destruction, approved by the Resolution of the Board of the National Bank of the Republic of Belarus dated September 19, 2016 No. 494 (hereinafter - Instruction No. 494);
- Resolution of the Council of Ministers of the Republic of Belarus dated March 16, 2006 No. 367 "On approval of the form of a special registration form for a financial transaction subject to special control, and Instructions on the procedure for filling out, transferring, registering, recording and storing special registration forms for financial transactions subject to special control" (hereinafter - Resolution No. 367);
- Resolution of the Council of Ministers of the Republic of Belarus of December 30, 2014 No. 1256 "On Approval of the Regulation on the Procedure for Determining the List of Persons Participating in Terrorist Activities, Involved in the Proliferation of Weapons of Mass Destruction, or under the Control of Such Persons, Appealing the Decision to Include Persons in such a List and consideration of other applications of these persons, bringing this list to the attention of persons carrying out financial transactions and the financial monitoring body "(hereinafter - Resolution No. 1256);
- Regulations on the procedure for applying measures related to freezing funds and (or) blocking financial transactions of persons involved in terrorist activities, approved by the Resolution of the Council of Ministers of the Republic of Belarus dated September 16, 2016 No. 735 (hereinafter - Resolution No. 735);
- Resolution of the Council of Ministers of the Republic of Belarus dated November 23, 2016 No. 954 "On approval of the regulation on the procedure for the suspension and resumption of financial transactions by the financial monitoring body, interaction of the financial monitoring body with persons carrying out financial transactions" (hereinafter - Resolution No. 954);
- Resolutions of the Council of Ministers of the Republic of Belarus of December 18, 2014 No. 1193 "On the procedure for determining the list of states (territories) that do not comply with the recommendations of the Group for the Development of Financial Measures to Combat Money Laundering, do not participate in international cooperation in the field of preventing money laundering, financing terrorist activities and financing the proliferation of weapons of mass destruction, and the procedure for their publication";

- Resolutions of the Council of Ministers of the Republic of Belarus of May 7, 2015 No. 379 "On the procedure for compiling a list of persons classified as foreign public officials, officials of public international organizations, persons holding positions included in the list of public positions of the Republic of Belarus determined by the President of the Republic of Belarus" (hereinafter - Resolution No. 379);
- other legislative and regulatory legal acts of the Republic of Belarus in the field of preventing legalization of proceeds from crime, financing terrorist activities, and financing the proliferation of weapons of mass destruction.

2. The internal control rules regulate the activities of BFB Capital LLC (hereinafter referred to as the Company) in the field of preventing money laundering, financing terrorist activities and financing the proliferation of weapons of mass destruction, establish the duties and procedures for the Company's employees in order to comply with these Internal Control Rules, as well as those responsible for their implementation.

3. In relation to these Internal Control Rules, the following terms are used in the following meanings:

analyzed period - a period of time, on average one calendar month, for which the responsible official analyzes the client's financial transactions at the stage of subsequent control;

client profile - a set of data collected by the Company in relation to a client during his identification and verification, containing information about the client and his activities, established by Article 8 of Law No. 165-3, Instruction No. 494 and these Internal Control Rules;

questionnaire - preparation by the Company of the client's questionnaire;

beneficial owner - an individual who owns the client's property, or owns at least 10 percent of the shares (shares in the authorized capital, shares) of the client-organization, or directly or indirectly (through third parties) ultimately has the right or the ability to give mandatory instructions for the client, to influence the decisions made by him or to otherwise control his actions;

blocking of a financial transaction - a prohibition on the implementation of a financial transaction, the participant of which or the beneficiary of which is an organization, an individual, including an individual entrepreneur, included in the duly determined list of organizations and individuals involved in terrorist activities, or an organization whose beneficial owner is an individual included in this list;

verification - measures taken by the Company to verify and (or) supplement the client's data obtained in the course of identification;

internal control - a set of measures to prevent and identify financial transactions related to the legalization of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction;

freezing of funds - a ban on the disposal, use of funds, if the owner or owner of the funds is an organization, an individual, including an individual entrepreneur, included in the duly determined list of organizations and individuals involved in terrorist activities, or an organization whose beneficial owner is an individual included in this list;

identification - a set of measures to establish certain by Law No. 165-3, Instruction No. 494 and these Rules of internal control of client data;

financial monitoring body - the Financial Monitoring Department of the State Control Committee of the Republic of Belarus;

responsible official - a person responsible for the organization and implementation of internal control in the Company. The responsible officer is appointed by order of the director of the Company;

suspicious financial transaction - a financial transaction in respect of which the Company has suspicions that it is being carried out for the purpose of legalizing proceeds from crime, financing terrorist activities or financing the proliferation of weapons of mass destruction, after the Company makes a decision to classify it as a financial transaction subject to a special control;

the systematic nature of financial transactions - the implementation of financial transactions by the client of the Company three or more times during the analyzed period;

suspicious financial transaction - a financial transaction in respect of which the Company suspects that it is being carried out for the purpose of legalizing proceeds from crime, financing terrorist activities or financing the proliferation of weapons of mass destruction, before the Company makes a decision to classify (not classify) it to a financial transaction subject to special control.

II. Organization of an internal control system in the field of preventing money laundering, financing terrorist activities and financing the proliferation of weapons of mass destruction

4. The Company's internal control system is organized to ensure that the Company and its employees are not intentionally or unintentionally involved in the legalization of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction.

5. The Company's internal control system is implemented in the following main areas:
identification and verification of all clients of the Company engaged in financial transactions, as well as storage of information containing identification data in accordance with the requirements of Law No. 165-3 and regulatory legal acts in the field of preventing money laundering, financing terrorist activities and financing the proliferation of weapons mass destruction, as well as these Internal Control Rules;

monitoring of financial transactions of clients in order to identify financial transactions subject to special control, documenting such transactions and transferring the relevant information to the financial monitoring body;

storage of information and documents (their copies) during the period established by law.

6. Internal control in the Company is carried out at all stages of financial transactions and is divided into the following types:

- preliminary control, carried out by collecting and studying the necessary information and documents (their copies) and fixing the data in the client's questionnaire to form an idea about the client;
- current control, carried out by monitoring financial transactions carried out by the client, taking into account the information available to the Company, after preliminary control, in order to identify financial transactions subject to special control;

follow-up control, carried out by analyzing the client's transactions performed in the previous period in order to identify suspicious financial transactions that are of a long-term nature and are not determined at the stage of current control as subject to special control.

7. The director of the Company is appointed as the official responsible for the implementation of the Internal Control Rules. The Company creates a special structural unit - the internal control sector - responsible for the development and timely updating of the Internal Control Rules. The Company appoints a responsible official (responsible officials), whose duties include performing the following functions:

- organization of identification and verification of the Company's clients carrying out financial transactions;
- making a decision on recognizing a financial transaction as suspicious (unsuspicious) and submitting (not submitting) information about it to the financial monitoring body;
- obtaining and updating the list of organizations, individuals, including individual entrepreneurs, involved in terrorist activities;
- making a decision on freezing funds and (or) blocking financial transactions in relation to persons involved in terrorist activities in cases stipulated by legislative acts;
- checking the correctness and completeness of filling in special forms in accordance with the requirements of Resolution No. 367, as well as the timeliness of their submission to the financial monitoring body;
- signing of special forms sent to the financial monitoring body;
- advising the Company's employees on issues arising from the implementation of the Internal Control Rules, risk management procedures, client identification and filling out special forms;
- organization of training for the Company's employees on the prevention of legalization of proceeds from crime, financing of terrorist activities and financing the proliferation of weapons of mass destruction;
- checking at least once a year the knowledge of the Company's employees responsible for compliance with the Internal Control Rules;
- other functions provided for by these Internal Control Rules and the legislation of the Republic of Belarus in the field of preventing legalization of proceeds from crime, financing terrorist activities and financing the proliferation of weapons of mass destruction.

8. The main principle of organizing the internal control system is the participation of all employees of the Company, within the framework of their job duties, in the processes of identifying clients and their representatives, conducting questionnaires and identifying financial transactions that are subject to special control in their activities.

Specific functions for fulfilling the requirements of Law No. 165-3 and these Internal Control Rules are enshrined in the job descriptions of employees or are established by internal regulations. The functions of responsible officials for compliance with the Internal Control Rules are enshrined in orders for the appointment of officials and (or) the distribution of duties or in job descriptions. The functions of compliance with the Internal Control Rules of other employees are enshrined in their job descriptions.

III. Managing the risks associated with money laundering, terrorist financing and financing the proliferation of weapons of mass destruction

9. Risk management related to money laundering, financing of terrorist activities and financing the proliferation of weapons of mass destruction (hereinafter referred to as money laundering risks) is carried out on the basis of a risk-based approach.

The main objective of money laundering risk management is to classify the Company's clients by risk levels in order to identify clients with high money laundering risks and apply appropriate measures of extended control in work with such clients.

10. The initial identification and assessment of the risk of working with a client is carried out by a responsible official or an employee, in accordance with his assigned job responsibilities, at the stage of questioning the client.

The risk scale of working with a client consists of two levels: low and high. To assess the risk of working with a client, a three-vector model of risk distribution is used, within which the following vectors are assessed:

- client profile risk;
- risk by geographic region;
- risk by types of transactions.

11. As a result of the analysis of the information that the Company has in relation to a client carrying out financial transactions using the method based on a point risk assessment, each of the three vectors of the model is assigned a degree of risk (low or high). Estimated indicators for each vector of risk distribution, taking into account the group of clients, are given in Appendix 1 to these Internal Control Rules. Based on the values of the degrees of risk for each vector, to assign the final degree of risk to the work with the client, the matrix for assigning the final degree of risk is used based on a three-vector model of risk distribution in accordance with Appendix 2 to these Rules of Internal Control. The assigned degree of risk of working with a client (by vectors and total) is indicated in the section of the client's questionnaire "Service information".

The correctness of establishing a high final degree of risk of working with a client is checked and confirmed in the client's questionnaire by the responsible official.

If necessary, the responsible official has the right to make a reasoned decision on assigning a different degree of risk to work with a client, justifying it in the "Service information" section of the client's questionnaire.

In the event of a change in the data specified in the client's questionnaire, including those obtained through verification, as well as the nature of the financial transactions carried out by the client, or when the Company receives other information about the client that affects the estimated indicator for any of the vectors of the three-vector risk distribution model, the responsible official and (or) employee, in accordance with the assigned official duties, updates the corresponding estimated indicators defined in Appendix 1 for each risk distribution vector and, if necessary, revises the degree of risk according to the risk distribution vector, the estimated indicators for which were changed, and the final degree of risk of working with the client.

12. When a low degree of risk of working with a client is established, standard internal control procedures are applied, which include the use of a standard form for conducting client identification, updating client information as clients provide information, but at least once every three years, other measures determined by the person in charge an official independently based on the circumstances.

13. In order to limit (reduce) the risks of working with a client, responsible officials apply the following extended internal control measures to clients who have a high final degree of risk:

- request for additional information and documents (their copies), their analysis, including by comparing the information contained in them with the information available to the
- company, using an extended form to carry out client identification;

- updating information about the client as the information is provided to them, but at least once a year, and if there is a suspicion of the reliability and accuracy of the previously obtained data - within twenty working days following the day the decision was made by the responsible official about the presence of such suspicions;
- identification of financial transactions subject to special control and sending information about them to the financial monitoring body;
- refusal to carry out a financial transaction in cases and in the manner prescribed by law;
- other measures, the composition of which is determined by the responsible official independently in accordance with the legislation of the Republic of Belarus.

IV. Client identification and questioning

14. Mandatory identification of the Company's clients is carried out before being hired by employees, in accordance with their assigned job responsibilities, in the cases established by Article 8 of Law No. 165-3.

The company establishes the identification data of clients on the basis of information and documents (their copies), including documents that are the basis for the implementation of transactions, which are provided by the client, as well as received from other sources not prohibited by law.

15. For the purpose of identification, the client is offered a questionnaire to fill out, which is filled in with the client's personal presence in the Company, or an electronic registration card for creating and maintaining an electronic service "Client's personal account" on the Company's website.

The amount of data required to carry out client identification is determined by the form of the questionnaire in Appendix 3 to these Internal Control Rules based on the group to which the client belongs.

16. When remotely identifying a client, in addition to filling out an electronic registration card, the Company receives the following documents sent by the client from the electronic mailbox specified in the electronic registration card to the Company's electronic mailbox:

for legal entities - a certificate of state registration of a legal entity, a charter, an office lease agreement (if any), documents proving the identity of the head, the person in charge of accounting;

for an individual entrepreneur - a photograph showing a client with an identity document opened on pages containing personal data and a mark of residence, as well as a certificate of state registration;

for individuals - a photograph showing a client with an identity document opened on pages containing personal data and a mark of residence. If the place of residence indicated in the identity document differs from the actual place of residence, copies of documents confirming the fact of residence at the specified address are provided (lease agreement for residential premises, checks for payment of utilities, etc.).

In addition, the identification of the client can be carried out by means of the Web-ID procedure (remote identification by means of establishing a video connection with the client). In the process of such identification, the client must hold an identity document in front of the webcam to confirm the accuracy of the previously provided information and to compare the client's face with the photograph placed in the identity document.

17. Identification data is recorded in a questionnaire, which can be issued in electronic and (or) paper form.

Depending on the assigned degree of risk to work with a client, the questionnaire can be standard (for clients with whom the assigned degree of risk is assigned) and an extended form (for clients with whom the assigned degree of risk is assigned a high degree of risk).

The questionnaire forms are developed by the Company independently, while the standard form must contain a list of identification data recorded in accordance with Article 8 of Law No. 165-3, and the extended form must contain additional identification data defined in Appendix 2 to Instruction No. 494.

18. When carrying out identification and questioning of clients, it is necessary: conduct an audit in order to identify foreign public officials, officials of public international organizations, persons holding positions included in the list of public positions of the Republic of Belarus (hereinafter - politically exposed persons) determined by the President of the Republic of Belarus, members of their families and persons close to them, as well as organizations, the beneficial owners of which are these persons. The result of the check with the appropriate mark on the attribution / non-attribution of the client (for the organization - the beneficial owner) to politically exposed persons, their family members and persons close to them is reflected in paragraph 6 of the "Service information" section of the questionnaire. Verification to establish the status of a client as a politically exposed person is carried out on the basis of information from the list of persons classified as foreign public officials, officials of public international organizations, persons holding positions included in the list of public positions of the Republic of Belarus determined by the President of the Republic of Belarus, formed in accordance with the Resolution No. 379 and posted on the official website of the State Control Committee;

conclude an agreement on transactions with non-deliverable over-the-counter financial instruments with politically exposed persons, as well as organizations, the beneficial owners of which they are, only after obtaining the written permission of the director of the Company, and if the client acquired the appropriate status and (or) became the beneficial owner of the organization after the conclusion with him agreements on transactions with non-deliverable over-the-counter financial instruments - obtain written permission from the director of the Company to continue the validity (renewal) of this agreement.

19. An integral part of each questionnaire is the section "Service information", which indicates:

- assigned degree of risk of working with a client (final and for each vector of the model);
- decision of the responsible official to change the final degree of risk (if the responsible official determines the final degree of risk, different from the calculated one). Justification of a high degree of risk (if assigned);
- decision of the responsible official on verification and the timing of its implementation;
- decision of the responsible official on the further actions of the Company in relation to the client on the suspicious transactions performed by him (making a reasoned decision on recognizing the financial transaction as suspicious (unsuspicious) and submitting (not submitting) information about it to the financial monitoring body);

- decision of the responsible official to freeze funds, block a financial transaction and (or) refuse to conclude an agreement on transactions with non-deliverable OTC financial instruments;
- grounds for recognizing a client as a beneficial owner - an organization of a person performing the functions of a sole executive body, or a person heading a collegial executive body (if it is impossible to identify the beneficial owner);
- the result of checking the client for attribution (for the organization - the beneficial owner) to politically exposed persons, members of their families or persons close to them;
- date of filling out and updating (updating) the questionnaire;
- by whom and what changes were made to the client's profile;
- the reasons for the lack of identification data and the measures taken by the Company to obtain them.

20. Employees carrying out identification and questioning of clients should take reasonable and accessible measures in the current circumstances to determine the sources of origin of clients' funds, including politically exposed persons.

21. If necessary, the degree of risk of working with a client is revised as the data specified in the client's questionnaire changes, including those obtained as a result of verification, as well as the nature of the financial transactions carried out by the client.

22. The following methods are used to carry out verification:

a request, in the manner and within the limits established by the legislation of the Republic of Belarus, for information about the client in state bodies and other organizations (requests are sent to various organizations in cases of doubts about the authenticity of documents and information provided by the client about himself and received in the process of his identification);

verification of the submitted identification data of an individual entrepreneur, legal entity with data assigned by state authorities;

contact with the client, his representative in person, by phone, in writing, by e-mail.

23. Information and documents (their copies) obtained in the course of identification of clients, their representatives, other information received and compiled by the Company during verification are placed in the client's file.

24. Information about the identification data of participants in a financial transaction is stored on paper and (or) in electronic form, in a place that excludes the access of unauthorized persons for five years after the termination of the agreement on transactions with non-deliverable over-the-counter financial instruments.

V. Identification in the activities of clients of financial transactions subject to special control

25. Financial transactions are subject to special control, regardless of whether they were performed or not in the following cases:

if an employee of the Company carrying out a financial transaction has suspicions that the financial transaction is related to the receipt and (or) legalization of proceeds from crime, financing of terrorist activities, proliferation or financing of the proliferation of weapons of mass destruction; does not correspond to the objectives of the client's activity - a non-profit organization, established by the constituent documents, types and (or) the nature of the client's

activities; carried out by a participant in a financial transaction repeatedly in order to evade registration in a special form;

if a participant in a financial transaction or a beneficiary of a financial transaction is an organization, an individual, including an individual entrepreneur, included in the duly determined list of organizations and individuals involved in terrorist activities (hereinafter referred to as the list), or an organization whose beneficial owner is an individual person included in this list. The procedure for determining the list of these persons and the procedure for bringing it to the attention of persons carrying out financial transactions is established by Resolution No. 1256. The procedure for obtaining and updating on an ongoing basis the data contained in the list is described in Section VI of these Internal Control Rules;

if a participant in a financial transaction is registered, has a place of residence or location in a state (territory) that (which) does not participate in international cooperation in the field of preventing money laundering, financing terrorist activities and financing the proliferation of weapons of mass destruction, or does not fulfill FATF recommendations, as well as if financial transactions are carried out using an account with a bank registered in such a state (in the territory), and if the amount of the financial transaction is equal to or exceeds 500 base values for individuals or equal to or exceeds 1000 base values for organizations and individuals entrepreneurs;

if the amount of a financial transaction is equal to or exceeds 2000 basic values for individuals or equal or exceeds 20,000 basic values for organizations and individual entrepreneurs and at the same time refers to one of the following types of financial transactions: financial transactions with cash; money postal order; financial transactions with movable and immovable property; financial transactions with securities; financial transaction on loans; financial transaction to transfer debt and assignment of claim.

26. The criteria for identifying and signs of suspicious financial transactions are:

26.1 depositing funds by the Company into the guarantee fund of the National Forex Center or refunding funds from the guarantee fund from an account (account) opened in an offshore zone;

26.2 the client makes a margin collateral or returns the margin collateral and (or) a positive price difference for transactions with non-deliverable OTC financial instruments, not included in the margin collateral (in accordance with the agreement), from the account (to the account) opened in offshore zone;

26.3 depositing by the client of the margin collateral or return to him of the margin collateral and (or) a positive difference in prices for transactions with non-deliverable OTC financial instruments, not included in the margin collateral (in accordance with the agreement), from the account (to the account) opened in country other than the country of its registration (residence);

26.4 depositing margin security in favor of the client by a third party, including on the basis of a power of attorney issued by the client;

26.5 return of the client's margin collateral and (or) a positive price difference for completed transactions with non-deliverable OTC financial instruments, not included in the margin collateral (in accordance with the agreement), to the account of a third party, including those acting under a power of attorney issued to him by the client;

26.6 the submission by the client of suspicious information that cannot be verified or is too expensive to verify;

26.7 submission by the client of documents (copies) that raise doubts about their authenticity (reliability);

26.8 unjustified refusal of the client to submit the requested documents (information), unjustified delays in their submission or excessive concern of the client with confidentiality issues;

26.9 one-time or multiple, during the analyzed period, the introduction of margin security by an individual under the age of 21 or over 65 in an amount exceeding 300 basic units;

26.10 systematic depositing by the client of the amount of margin collateral during the analyzed period and subsequent initiation of its return without the client performing transactions with non-deliverable OTC financial instruments or carrying out transactions for an amount not exceeding 10 percent of the total amount of the margin collateral;

26.11 carrying out a financial transaction that does not meet any of the criteria for identifying and signs of suspicious financial transactions, in respect of which the Company suspects that it is being carried out for the purpose of legalizing proceeds from crime, financing terrorist activities and financing the proliferation of weapons of mass destruction.

26.12. depositing by an individual of margin collateral in the cash desk of the Company, or receiving from the cash desk of margin collateral and (or) a positive price difference for transactions with non-deliverable OTC financial instruments, not included in the margin collateral (in accordance with the agreement), in cash in the amount, exceeding 500 base units;

26.13. depositing of margin security by a legal entity into the cash desk of the Company, or receipt from the cash desk of margin security and (or) a positive difference in prices for transactions with non-deliverable over-the-counter financial instruments, not included in the margin security (in accordance with the agreement), in cash.

27. If a suspicious financial transaction is identified that meets the criterion (s) for identifying and the attribute (s) of suspicious financial transactions defined in paragraph 26 of these Internal Control Rules, or meets other control conditions specified in paragraph 25 of these Internal Control Rules, the employee who identified this transaction , performs actions in the following order:

prepares a message in electronic form or on paper containing information about the type of financial transaction and the grounds for its implementation, the date of the financial transaction and how much it was carried out. Information obtained when identifying participants in a financial transaction may be attached to the message. The message and the necessary documents on a suspicious financial transaction are sent to the responsible official (if another employee identified such a financial transaction);

if necessary, an employee or a responsible official of the Company applies to the client with a request for clarification about the economic meaning of a financial transaction;

in the presence (absence) of reasonable suspicions for classifying the client's financial transaction as subject to special control, the responsible official makes a reasoned decision on recognizing the client's financial transaction as suspicious (unsuspicious) and submitting (not submitting) information about it to the financial monitoring body.

28. If the responsible official recognizes the financial transaction as unsuspecting, the justification for the decision to recognize the financial transaction as unsuspecting is adopted and recorded in the message.

Messages for which a decision was made not to send a special form are recorded in the message log, the form of which is given in Appendix 4 to these Internal Control Rules.

Logging of messages can be carried out both on paper and in electronic form.

If the responsible official decides to recognize the financial transaction as suspicious, the corresponding record of the decision taken in the message may not be drawn up, a special form is sent to the financial monitoring body within the time period established by law.

29. When a suspicious financial transaction is identified, the responsible official, if necessary, makes the following decisions:

on the request for additional documents, their analysis, including by comparing the information contained in them with the information available to the Company;

on revising the degree of risk of working with a client;

on unilateral refusal to execute an agreement on transactions with non-deliverable over-the-counter financial instruments in accordance with the legislation of the Republic of Belarus and the concluded agreement;

other decisions taken in relation to a participant in a financial transaction, determined by the Company independently within the framework of the legislation of the Republic of Belarus.

30. Financial transactions subject to special control are registered in a special form and submitted to the financial monitoring body in accordance with the procedure established by Resolution No. 367. A special form is filled out in duplicate for each financial transaction.

Second copies of special forms and other documents related to the implementation of financial transactions subject to special control are stored for five years from the date of their compilation.

Registration of special forms sent to the financial monitoring body is carried out in the register of special forms, which must contain the information provided for in paragraph 102 of Resolution No. 367. The form of a properly executed journal is in Appendix 5 to these Internal Control Rules.

Keeping a journal of accounting of special forms can be carried out both on paper and in electronic form. The register of special forms is stored during the storage period of special forms, according to which information is entered into it.

31. The responsible official ensures the proper storage of client questionnaires, electronic copies of special forms and copies of other documents related to the implementation of financial transactions subject to special control, within the period established by law.

32. The responsible official ensures the confidentiality of information about financial transactions and the identification data of participants in a financial transaction.

VI. Freezing funds and (or) blocking financial transactions of persons involved in terrorist activities

Chapter 1. Procedure for identifying persons involved in terrorist activities

33. In order to prevent the financing of terrorist activities and the financing of weapons of mass destruction at the stages of preliminary and current control over ongoing financial transactions and in the process of identifying clients, their representatives and other participants in a financial transaction, as well as in the course of updating (updating) personal data of clients to identify persons, involved in terrorist activities, the identification data of clients is checked for their compliance with information from the list of organizations and individuals involved in terrorist activities.

34. The company receives the list from the official website of the State Control Committee and updates it in accordance with the information received from the regulatory state body on amendments to this list in accordance with Resolution No. 1256. The person

responsible for obtaining and updating the list on an ongoing basis is the responsible official of the Company.

Upon receipt of the updated list, the responsible official, no later than one business day from the date of receipt, checks the compliance of clients with the information contained in the list in order to identify the funds of persons involved in terrorist activities, and, if such persons are found, freezes the funds and (or) blocking a financial transaction.

35. The persons authorized to identify persons included in the list among the Company's clients and to make decisions in accordance with these Internal Control Rules are employees of the internal control sector or employees of other divisions within the framework of their official duties.

36. In case of identification of a person involved in terrorist activities, or in case of receipt of relevant information from the financial monitoring body, the Company takes the following actions:

freezes the funds of a client who is a person involved in terrorist activities and (or) blocks a financial transaction if the participant or beneficiary is a person involved in terrorist activities;

refuses the client to conclude and (or) execute an agreement on transactions with non-deliverable over-the-counter financial instruments in the event that he is attributed to a person involved in terrorist activities, or the beneficial owner of the organization is in this list;

informs the financial monitoring body about freezing funds and (or) blocking a financial transaction;

informs the client about the freezing of his funds and (or) blocking of a financial transaction, of which he is a participant, after the Company receives a written request from the client or his representative.

37. An authorized official of the Company, at least once every three months, checks the presence among clients of legal entities, individuals, including individual entrepreneurs, included in the list, as well as the presence in the list of legal entities whose beneficial owners are individuals involved in terrorist activities ... If such clients are identified, immediately, but no later than one business day from the date of identification, freezes their funds.

The results of audits are entered into the audit log in accordance with the form given in Appendix 6 to these Internal Control Rules.

38. Checking clients for their presence in the list is carried out by checking his last name, first name and patronymic (if any) or the name of the organization, both in Russian and Latin spelling with the list.

Chapter 2. Procedure for freezing funds and blocking financial transactions

39. If the Company's employees have established that the client or the beneficial owner of the client - the organization is a person involved in terrorist activities, then on the day this information is established, the responsible official is obliged to freeze the funds of this client, block the financial transaction or refuse the client to conclude an agreement on transactions with non-deliverable OTC financial instruments. The basis for making such a decision is fixed in clause 4.1 of the "Service information" section of the client's questionnaire.

Funds received to the account of the client, in respect of whom the freezing measures have been applied, are also subject to freezing.

40. If the Company has received a resolution on freezing funds and (or) blocking financial transactions in accordance with Appendix 1 to Resolution No. 735 in the form of an

electronic document or on paper, then the responsible official freezes funds and (or) blocks financial transactions on the day of receipt of such a resolution.

41. For each fact of freezing funds or blocking a financial transaction, including on the basis of a resolution of the financial monitoring body, the Company informs the financial monitoring body by sending a special form for registering a financial transaction, subject to special control, no later than the day during which the financial transaction was blocked or the funds were frozen.

42. Freezing of funds and (or) blocking of transactions is carried out without prior notice to the client or his representative. The period of freezing funds is indefinite (until they are thawed).

43. The company is obliged to inform the client or his representative about freezing funds and (or) blocking a financial transaction by providing written notification in the forms in accordance with Appendices 7-8 to these Internal Control Rules after receiving a corresponding written request from this client or his representative.

44. Measures related to freezing funds and (or) blocking a financial transaction are applied by the Company to the extent that they do not contradict the decisions of the criminal prosecution authorities, court orders on the imposition of seizure, confiscation, turning funds into state revenue.

Chapter 3. Procedure for unfreezing funds and unblocking financial transactions

45. The company immediately unfreezes funds or unblocks a financial transaction in the following cases:

if an organization, an individual, including an individual entrepreneur, whose funds were frozen or whose financial transactions were blocked, are excluded from the list;

if measures related to the freezing of funds and (or) blocking of financial transactions were applied as a result of the lack of all the necessary identification information about the client, and subsequently the financial monitoring body or other competent body with the participation of the financial monitoring body established the non-involvement of the organization, individual, including an individual entrepreneur, terrorist activity or the proliferation of weapons of mass destruction.

46. The basis for unfreezing funds or unblocking financial transactions in the case provided for in paragraph three of clause 45 of these Internal Control Rules is a notification of the financial monitoring body about unfreezing funds and (or) unblocking financial transactions in the form in accordance with Appendix 2 to Resolution No. 735, received in electronic form or on paper.

Unfreezing of funds and (or) unblocking of a financial transaction is made on the day of receipt of such information.

47. A notice of unfreezing funds and (or) unblocking a financial transaction is sent to the client on the same day in the form in accordance with Appendices 9-10 to these Internal Control Rules.

48. Financial transactions to ensure the life of an individual, including an individual entrepreneur, attributed to a person involved in terrorist activities, during the period of the freezing of funds, are carried out by the Company on the basis of the permission of the financial monitoring body, issued in accordance with the procedure specified in parts four and five of Article 9-1 of Law No. 165-3, and the permission received from the financial monitoring body in the form of an electronic document or on paper in accordance with Appendix 3 to Resolution No. 735.

VII. The order of execution of decisions of the financial monitoring body on the suspension and resumption of financial transactions

49. Suspension of financial transactions by decision of the financial monitoring body is carried out on the basis of a resolution received by the Company in the form of an electronic document or on paper to suspend financial transactions in the form in accordance with Appendix 1 to Resolution No. 954.

50. The resolution on the suspension of financial transactions received by the Company in hard copy must be drawn up on the form of a document of the financial monitoring body, signed by the head (deputy head) of the financial monitoring body and certified by a seal with the image of the State Emblem of the Republic of Belarus.

The resolution on the suspension of financial transactions received by the Company in the form of an electronic document must be transferred to the Company in accordance with the legislation of the Republic of Belarus and confirmed by an electronic digital signature.

51. Suspension of financial transactions on the basis of a resolution to suspend financial transactions is carried out by the Company without prior notification of the participant in financial transactions.

52. The decision to suspend financial transactions received during the working day is subject to immediate execution.

The decision to suspend financial transactions, received after the end of the established working hours, is subject to immediate execution at the beginning of the next working day.

If the execution of the order to suspend financial transactions coincided with the end of the established working hours, it must be continued immediately at the beginning of the next working day.

53. Upon receipt of an order to suspend financial transactions, employees of the Company within the framework of their due duties or a responsible official without delay:

suspend financial transactions of a participant in financial transactions specified in this resolution;

refuse to register a transaction if at the time of execution of the resolution on the suspension of financial transactions the transaction was not registered (if there is a corresponding instruction in this resolution);

inform the financial monitoring body on the execution of the resolution on the suspension of financial transactions by sending a notification on the execution of the resolution on the suspension of financial transactions in the form in accordance with Appendix 3 to Resolution No. 954. This notification is sent to the financial monitoring body on the day of execution of the decision to suspend financial transactions in the form of an electronic document or on paper.

54. Financial transactions are suspended by the Company from the moment of execution of the resolution to suspend financial transactions until the receipt of the decision of the financial monitoring body to resume financial transactions.

55. The basis for the resumption of financial transactions by the decision of the financial monitoring body, which were suspended, is the receipt by the Company in the form of an electronic document or on paper of a notice of the resumption of financial transactions in the form in accordance with Appendix 2 to Resolution No. 954.

56. A notice of the resumption of financial transactions is drawn up in a manner similar to the procedure for issuing a resolution to suspend financial transactions in accordance with paragraph 50 of these Internal Control Rules.

57. The notification of the resumption of financial transactions is subject to mandatory execution by the employees of the Company within the framework of their official duties or by the responsible official no later than the working day following the day of receipt of such notification.

58. If it is not technically possible to execute the resolution on the suspension of financial transactions or a notice on the resumption of financial transactions within the specified time frame, the responsible official must, on the day of receipt of the resolution on the suspension of financial transactions or a notice on the resumption of financial transactions, inform the financial monitoring body about this in writing, indicating the reasons for the delay performance and deadline.

59. The company stores decisions on the suspension of financial transactions, notifications of the resumption of financial transactions, notifications of the execution of the decision to suspend financial transactions, including those received and transmitted in electronic form, adopted and transmitted within the framework of the execution of Resolution No. the day of their execution.

VIII. Requirements for the qualifications and training of the Company's employees

60. The responsible official (responsible officials) of the Company must have a higher economic or legal education and work experience in an economic or legal specialty in an organization that carries out financial transactions, government agencies (organizations) for at least six months. In the absence of higher education, such a responsible official must have work experience in an economic or legal specialty in an organization carrying out financial transactions, government agencies (organizations) for at least one year..

61. Company employees must be instructed in the prevention of money laundering, terrorist financing and financing weapons of mass destruction..

62. Briefing can be introductory (primary), planned and unscheduled (target).

62.1 Introductory (primary) instruction and familiarization with the regulatory legal acts of the Republic of Belarus, local regulatory legal acts of the Company on the prevention of legalization of proceeds from crime, financing of terrorist activities and financing of weapons of mass destruction with persons appointed to the position responsible for the implementation of internal control, with when hiring employees in the divisions of the Company involved in the implementation of financial transactions, it is carried out within 10 working days. Within one month from the date of the initial (introductory) briefing, an initial examination of the knowledge of employees is carried out.

62.2 Scheduled briefing (training) of responsible officials, employees of the Company involved in financial transactions is carried out at least once a year. The planned briefing should include familiarization with the measures taken by the Company in accordance with the regulatory legal acts of the Republic of Belarus in the field of preventing money laundering, financing terrorist activities and financing weapons of mass destruction and these Internal Control Rules, as well as information on the measures of responsibility, which can be applied to employees for failure to comply with the requirements of regulatory legal acts of the Republic of Belarus. The knowledge of the company's employees in this area is checked at least once a year..

62.3 Unscheduled (targeted) instruction on the prevention of legalization of proceeds from crime, financing of terrorist activities and financing of weapons of mass destruction is carried out in the following cases:

when changing legislation in the field of preventing money laundering, financing terrorist activities and financing weapons of mass destruction, receiving information documents on this topic from government agencies;

when changing the Internal Control Rules of the Company;

when violations or shortcomings in the work of the Company are revealed during inspections on the prevention of legalization of proceeds of crime, financing of terrorist activities and financing of weapons of mass destruction;

when an employee is transferred to the position of a person responsible for the implementation of internal control, or to another permanent position of an employee involved in financial transactions, when an employee leaves a long vacation, if the employee has knowledge in the field of preventing money laundering, financing terrorist activities and funding of weapons of mass destruction are not enough to fulfill their job duties.

63. The responsible official conducts briefings and tests of the knowledge of the Company's employees. Briefings are conducted with employees orally with a direction to familiarize themselves with the relevant materials (if necessary). Testing the knowledge of employees can be carried out orally or in the form of an electronic survey.

In the absence of an employee of the Company at the workplace on the date of appointment of briefing and (or) testing of knowledge for objective reasons, briefing and (or) testing of the knowledge of such an employee is carried out separately on the working day determined by the responsible official after the expiration of the objective reasons justifying his absence at work.

64. If, as a result of testing the knowledge of an employee of the Company, insufficient knowledge of the requirements of these Internal Control Rules and legislation in the field of prevention of legalization of proceeds from crime, financing of terrorist activities and financing of weapons of mass destruction is revealed to be sufficient for the performance of his job duties, re-testing of the knowledge of such employee is mandatory order within 10 working days after the identification of this fact.

65. The fact that an employee of the Company is instructed on the prevention of money laundering, financing of terrorist activities and financing of weapons of mass destruction and knowledge testing is recorded in special journals, the forms of which are set in Appendix 11 to these Internal Control Rules. Journals can be filled in on paper, where briefings and knowledge tests are confirmed by the employee's signature, or in electronic form, in which case the employee's signature is not required.