

**Trade and Development Bank of Mongolia**  
**Anti-Money Laundering and Counter-Terrorist Program**

1. The Bank is registered in Mongolia and regulated by the Mongolbank (Central Bank of Mongolia).
2. The Anti-Money Laundering and Counter-Terrorist Financing policy and the Bank's procedure comply with the national Law on Combating Money Laundering and Terrorist Financing and Proliferation of Weapons of Mass Destruction and Combating Terrorism, the Mongolbank's Procedures to prevent money laundering and terrorist financing and international and national recommendations. Regulations and standards.
3. TDBM is subject to the sanction programs administered by the United Nations, U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC), European Union and U.K. - Her Majesty's Treasury and consistent other international sanction lists issued by the government of jurisdictions of correspondent banks. All employees at the Bank's branches, departments and units will follow the corporate Anti-Money Laundering and Counter-Terrorist Program.
4. As required by law, TDBM has implemented a risk-based, enterprise-wide AML Program that complies with the specific provisions and the spirit of all relevant laws and regulations. Accordingly, TDB's AML Program includes, but is not limited to:
  - (1) Risk assessment
  - (2) A Customer Due Diligence Program and appropriate due diligence for customers depending on the risk profile
  - (3) Enhanced due diligence on higher-risk customers
  - (4) Correspondent banking relationship
  - (5) Sanctions compliance
  - (6) Processes and systems to monitor customer transactions and identify potentially suspicious activity
  - (7) Legal action on reports, transactions, or suspicious transactions/actions
  - (8) Reporting, of suspicious activity to appropriate regulatory bodies;
  - (9) All employee training
  - (10) Relevant AML/CTF documentation and records are maintained for at least seven years after account closing.