

**Anti-Money Laundering and  
Counter Terrorism Financing Policy Statement**

This policy sets out GOLOMT BANK's commitment to understanding and minimizing our risks in relation to money laundering and terrorist financing so our services are not abused to legitimize the proceeds of crime. Our commitment to this strengthens our goals of achieving good ethical business and trading standards. Our aim, by having robust policies and procedures and the creation of a compliance culture within the firm, is to prevent money laundering and terrorist financing. In order to achieve this we have undertaken the following:

**1. Appointment of the nominated person:**

Head of Compliance Department is: (Mrs.) Munkhjargal N.

Tel: +976-70111646-1714

E-mail: [munkhjargal@golomtbank.com](mailto:munkhjargal@golomtbank.com)

Mrs. Munkhjargal N. is available to discuss any matters relating to the Bank's policies and procedures relating to the Money Laundering Regulations. In the absence or sickness of Chaminchimeg Ts. the following Senior AML Officer has been appointed. The Bank's Senior AML Officer is: (Mrs.) Nomundari Sh.,

Tel: +976-70111646-91471

E-mail: [nomundari\\_sh@golomtbank.com](mailto:nomundari_sh@golomtbank.com)

Mrs. Nomundari Sh. is responsible for responding to correspondent banks' due diligence questionnaires, fraud investigation, overall monitoring of internal AML system including AMLOCK, financial crime detection and monitoring system.

**2. Establishment of internal procedures appropriate to the Money Laundering Regulation.**

We have established appropriate and risk-sensitive policies and procedures relating to:

- Know Your customer requirements
- Reporting suspicious activity and transaction
- Record-keeping
- Internal control
- Risk assessment and management; and
- Compliance management;

**3. Establishment of internal training** requirements so all individuals within the Bank understand their responsibilities within the Bank's policy and procedures and their wider responsibilities under the Mongolian Anti Money Laundering Law. To this end we will ensure all individuals within the Bank are trained at regular intervals for:

- awareness of the relevant legislation and any changes
- understanding of their roles and responsibilities under the Anti Money Laundering regime
- updates on particular threats and alerts for the firm or the profession
- how to recognize potential suspicious activity
- how to report suspicious activity
- the Bank's exposure to risk
- the Bank's client due diligence policies and procedures

#### **4. Record retention**

We will retain the following records for five years after ceasing to act for a client:

- client's risk assessments
- client 's identity and verification
- client's ongoing monitoring
- staff training
- internal reporting
- external reporting.

#### **5. Reporting suspicious transactions**

The Bank through the Compliance Department has established procedures for assessing internal suspicious activity reports and on the decision making process for external reporting. We have established procedures for making suspicious activity reports to the Financial Information Unit (FIU) of the Bank of Mongolia and for the secure retention and storage of internal and external reports.

#### **6. Aiding law enforcement**

The Bank through the Compliance Department has established procedures for aiding any law enforcement agencies who obtain money laundering investigation orders against our clients. These procedures relate to the collation and secure retention of the information required and systems to ensure that confidentiality of the client is maintained were necessary.

#### **7. Staff commitment to the Bank's policy and procedures**

It is important that our staff understands the compliance culture and the roles and responsibilities placed upon them. Penalties imposed including fines and imprisonment can apply to individuals as well as the Bank. So we must all:

- ensure we understand the firm's policy and procedures contained in this document, and ask relevant Officer if unsure
- ensure that during the course of our work for the Bank we don't turn a blind eye to the obvious. If we have doubts over the legitimacy of a transaction or event then we must follow procedures to discuss the situation or make an internal suspicious activity report. It is only by following these procedures we are protected from the possible penalties contained within the legislation
- remember that we are not required to be an investigator that is the role of law enforcement, neither are we judge nor jury
- remember that 'tipping off' is an offence under the legislation. We must not discuss what we may or may not report with the client and don't make reports the topic of general conversation within the office



Mrs. Munkhjargal N.,  
Head of Compliance Department  
GOLOMT BANK LLC

Executed on this: 15 May 2024