

Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Policy

Why We Have This Policy

Iute applies a robust internal policy for the prevention and combating of money laundering and terrorist financing, in compliance with the legislation of the Republic of Moldova (Law No. 308/2017, Law No. 1/2018 on Non-Bank Credit Organizations, regulations of the National Bank of Moldova, and guidelines issued by the Service for Prevention and Combating Money Laundering). The purpose of this policy is to protect the Company, its customers, and the financial system from misuse for illicit purposes.

What This Means for You

Identification and Verification (KYC): When establishing a business relationship, we verify your identity (including through digital remote onboarding solutions, where applicable) and, in the case of legal entities, the identity of the beneficial owner. [

- **Data Updates.** We may periodically request you to confirm or update your personal data and supporting documentation, particularly where relevant changes occur.
- **Risk Assessment.** Each customer is assessed according to their risk profile (low, medium, or high risk). Enhanced due diligence measures are applied to customers presenting a higher level of risk.
- **Transaction Monitoring.** Transactions are subject to ongoing monitoring through dedicated automated systems designed to identify unusual or suspicious activities.

Reporting and Confidentiality

We are legally required to report to the competent authorities (the Service for Prevention and Combating Money Laundering) any suspicious transaction or activity, as well as certain transactions exceeding statutory thresholds. Due to legal restrictions, we are not permitted to inform customers if a transaction or activity has been reported as suspicious.

Categories of Customers or Transactions That We Cannot Accept

We do not enter into, or we discontinue, business relationships with individuals or entities that are subject to international sanctions, involved in terrorist activities, have an unclear beneficial ownership structure, or refuse to provide the requested identification information and documentation. We do not open anonymous accounts or accounts under fictitious names.

Record Retention

Documents and information collected are retained throughout the duration of the business relationship and for an additional period of five (5) years following its termination, which period may be extended upon request of the competent authorities.

Your Obligations as a Customer

Customers are required to:

- Provide accurate, complete, and up-to-date information upon our request.
- Promptly notify us of any changes to identification data or beneficial ownership.
- Cooperate throughout the verification process, particularly in relation to transactions of higher value or transactions deemed unusual.

For any questions regarding this Policy, you may contact us through the support channels available within the application.

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