

Anti-Money Laundering Policy Statement.

It is FIMBank's policy to prevent the misuse of the FIMBank facilities for the laundering of money or for the purpose of financing terrorist activities. FIMBank is committed to full compliance with all applicable laws and regulations regarding the prevention of money laundering and terrorist financing.

For these purposes, money laundering means the conversion, transfer, concealment or retention of any funds or property knowing that the funds or property are derived from any activity that constitutes a criminal offence under Maltese law. The term money laundering should be interpreted as including trade-based money laundering and terrorist financing which refers to the process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimise their illegal origins or finance their activities.

If FIMBank, its personnel and/or its facilities are misused for money laundering or terrorist financing, even inadvertently, FIMBank could possibly be subject to penalties. Such activities could also jeopardise the Bank's reputation in local and global markets.

FIMBank places considerable importance in governmental and private sector initiatives to fight financial crime. As an internationally active institution, FIMBank will always cooperate and provide all possible assistance to the Maltese and supranational authorities in this effort.

FIMBank has adopted a Policy Manual and a Procedures Manual which provide the basis for all employees to comply with all relevant requirements in this area and assist employees in preserving the good name and reputation of FIMBank. Employees should be alert to the possibility of FIMBank being unwittingly involved in the activities of third parties who may seek to use FIMBank facilities to hide the source or beneficial ownership of money or other financial property. There could also be serious consequences for directors, officers, managers and employees, as the case may be, namely fines or imprisonment, in respect of offences against the law or regulations.

This Policy Statement sets out the principles that are of universal application within the FIMBank Group, including offices and branches located overseas. Where FIMBank p.l.c. or any of its subsidiaries are involved in associated undertakings, whether in Malta or overseas, it is expected that such undertakings, whilst not falling within the scope of this Policy Statement, should observe together with the applicable laws, the rules and regulations that adhere to these principles at least as a minimum best practice.

Minimum Standards

This Policy statement is meant to set the minimum standards to which FIMBank p.l.c. will adhere to. In some circumstances the FIMBank policies and procedures set a higher standard than that established by the applicable law. Under all circumstances FIMBank p.l.c. will conduct its business in compliance with the following general principles:

- Ensuring that FIMBank p.l.c. is not used for or involved in money laundering and terrorist financing.
- Maintaining written AML policies and procedures, a system of internal controls to ensure ongoing AML compliance by a designated person(s), take appropriate action once suspicious activity is detected and a proper and thorough process for filing Suspicious Transaction Report is followed.
- Ensuring compliance with applicable anti-money laundering and terrorist financing laws and regulations in each jurisdiction that is in accordance with the recommendations of the Financial Action Task Force on Money Laundering and Terrorist Financing and the Wolfsberg Principles, where applicable.
- Ensuring that the Bank's anti-money laundering policies are applied to all business Units.
- Reporting all identified suspicious activities to the competent authorities to the extent that it can do so under all applicable foreign and domestic laws. To this end FIMBank p.l.c. has also appointed a Money Laundering Reporting Officer (MLRO).
- Monitoring compliance with the Bank's anti-money laundering policies through a combination of internal audit, external audit and regulatory reviews of compliance with relevant anti-money laundering legislation and/or regulations.
- Maintaining and establishing correspondent banking relationships with a number of banks in relation of which, FIMBank p.l.c. has obtained the USA Patriot Certification in 2005.
- Retaining all customer related documents for a period as specified per the local laws of each jurisdiction.
- Refraining from conducting any business with Shell Banks. In addition to this, FIMBank p.l.c. does not offer services of opening anonymous accounts.
- Cooperating fully with law enforcement and regulatory agencies to the extent that it can do so under all applicable foreign and domestic laws.
- Providing regular training to staff on Know Your Customer and Anti-Money Laundering policies and new AML laws and regulations.
- Maintaining and updating a list of suspected individuals and organizations by the United Nations (UN) and the European Union (EU).
- Conducting enhanced due diligence for high risk customers.
- Obtaining all account opening documentation requirements as per the applicable legislation.
- Collaborating with and following guidance issued by the Malta Financial Intelligence Analysis Unit (FIAU). The FIAU is Malta's financial intelligence unit, and is responsible for the supervision of the implementation and enforcement of AML and ATF measures in the Maltese territory. The FIAU is also a member of the EGMONT Group.

For more information on FIMBank p.l.c. and the relevant supervisory authorities in Malta please visit:

FIMBank p.l.c. website: www.fimbank.com

Financial Intelligence Analysis Unit: www.fiumalta.org

Malta Financial Services Authority: www.mfsa.com.mt

For a copy of our completed AML questionnaire please click the relevant link.

For further AML inquiries please contact the following:

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