

## STATEMENT ON ICBK's AML/ATF & SANCTIONS PROGRAMS

As a regulated entity, the Industrial & Commercial Bank of China Canada (ICBK) is committed to complying with the requirements of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and reducing the likelihood of ICBK being used as a conduit for Money Laundering or Terrorist Financing. Additionally, ICBK is committed to complying with Economic Sanctions laws as applicable.

As a Senior Officer of the Bank, the Chief Anti-Money Laundering Officer (CAMLO) is responsible for establishing and maintaining ICBK's Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) and Sanctions programs and its related policies and procedures (Programs). The Programs define ICBK's respective risk appetite and establish the minimum requirements for managing the associated risks, including:

- Inherent Risk Assessments, and ongoing assessment of risk associated with client relationships; products and services; technology; jurisdiction/geography, and other financial crimes risks;
- Client due diligence and enhanced due diligence;
- Monitoring of transactions to detect and report suspicious activity;
- Reporting transactional activity as prescribed by the applicable laws and regulations;
- Delivery of ongoing training to employees, contractors and relevant stakeholders;
- CAMLO, Senior Management and Board oversight of the Programs;
- Independent effectiveness review of the Programs;
- Recordkeeping and retention in accordance with applicable laws and regulations.

The effectiveness of the Programs is routinely assessed to ensure it remains current and aligns with business activities, regulatory developments, industry standards and best practices. This enables ICBK to adhere to all applicable laws and regulatory requirements, including the guidance provided by the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), Global Affairs Canada, and the Office of the Superintendent of Financial Institutions Canada (OSFI).