



I&M BANK LIMITED

Statement of Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), Sanctions, and Anti-Bribery and Corruption (ABC) Policy.

Overview

I&M Bank Limited is headquartered in Nairobi, Kenya, and is a subsidiary of I&M Group PLC, publicly listed in the Nairobi Securities Exchange. I&M Bank Limited is regulated by the Central Bank of Kenya. I&M Bank and the Group make every effort to remain in compliance with applicable Anti Money Laundering laws, rules, and guidance in the jurisdictions in which they operate.

To achieve this, the Bank, through its Risk Management Policy, is committed to combatting financial crime by ensuring that our products and services are not misused for money laundering, terrorism financing and fraudulent activities.

AML/CFT POLICY

The Bank has developed and implemented a risk-based Anti-Money Laundering (AML) program designed to comply with AML laws and regulations in Kenya and other applicable laws and regulations related to the prevention of money laundering in the jurisdictions where the I&M Group operates. The Bank's AML Program is comprised of AML policies, procedures, internal controls, and systems, which include but are not limited to the following:

- The appointment of a Money Laundering Reporting Officer (MLRO) of sufficient seniority responsible for overseeing the Bank's compliance with relevant legislation, regulations, rules, and industry guidance.
- Establishment and maintenance of a Risk-Based Approach (RBA) toward assessing and managing the money laundering and terrorist financing risks to the bank.
- Establishment and maintenance of risk-based customer due diligence, identification, verification, and Know Your Customer (KYC) procedures, including enhanced due diligence for those customers presenting higher risk, such as Politically Exposed Persons (PEPs) and Correspondent Banking relationships.
- Establishment and maintenance of risk-based systems and procedures to monitor ongoing customer activity.
- Procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate.
- The maintenance of appropriate records for the minimum prescribed periods.

- Training and awareness for all relevant employees; and
- The provision of appropriate management information and reporting to senior management of the bank's compliance with the requirements.

Sanctions Policy

The Bank's Sanctions Policy ensures that the Bank complies with the applicable sanctions laws. The Bank screens against the United Nations, European Union, UK Treasury, and US Office of Foreign Assets Control (OFAC) sanctions lists at a minimum.

Automated Sanction Screening is applied for customer onboarding, reverse database screening and real-time filtering for funds transfer/ transactions parties.

Anti-Bribery and Corruption

The Bank conducts all its business honestly and ethically. It takes a zero-tolerance approach to bribery and corruption. It is committed to acting professionally, fairly, and with integrity in all its relationships and business dealings, and it has implemented and enforced effective systems to counter bribery.



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Gul Khan
CEO



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Zipporah Gitau
Group CRO