

A group of diverse business professionals walking in profile against a bright, hazy background. The image is dominated by warm, golden-yellow light, creating a sense of movement and energy. The people are dressed in professional attire, and their forms are slightly blurred, suggesting motion. The overall mood is one of forward momentum and collaboration.

RAWBANK

is my bank.

COMPLIANCE

MEETING TODAY'S STANDARDS
AND TOMORROW'S CHALLENGES





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INTRODUCTION

A WORD FROM OUR MANAGING DIRECTOR, MR. MUSTAFA RAWJI

At home, in the Democratic Republic of Congo and abroad, Rawbank's reputation and image depend on the behaviour of each and every one of its employees. Empowering employees to make the best decisions is what we strive for at Rawbank.

At a time when banking compliance standards are becoming increasingly stringent, Rawbank is unwavering in its commitment to complying with the laws, regulations and good professional practices of various national and international institutions. As such, over the past few years, we have overhauled our compliance policy to bring the bank up to date with the highest international standards in terms of compliance.

Our future is dependent on the trust of our customers, partners, shareholders and the country's authorities and, as such, every

decision we make is driven by a concern for ethics and integrity, both internally with our employees and externally with our customers and partners.

In a rapidly changing world where the risks of terrorist financing, money laundering and corruption are increasingly present, Rawbank continues to think ahead, prevent and fine-tune its control mechanisms to comply with today's standards and tomorrow's challenges. All this is facilitated by our corporate culture founded on the principles of integrity and rigour.

It is in this spirit that we conduct our Compliance policy, which serves to guide us in our daily conduct. It reflects our ambition of being a benchmark Congolese bank with a reputation that contributes to the country's influence even beyond its borders.

“Rawbank continues to think ahead, prevent and fine-tune its control mechanisms to comply with today's standards and tomorrow's challenges.”



INSIGHT FROM ISAAC KALALA, COMPLIANCE AND CSR DIRECTOR

Compliance is a central component of a bank's business. It encompasses several aspects of our operations (financial security, regulatory compliance, ethics, etc.) and now demands specific methods and techniques that make it an independent function separate from other internal oversight functions.

The mantra that the Compliance Division has chosen for the current five-year period ending in 2025 is:

**Compliance, a guarantee of differentiation
and competitiveness in the long term.**

This statement reflects our main objective of making Compliance a tool that enables management and operational staff to carry out their daily duties satisfactorily and efficiently. At RAWBANK we are confident that it is entirely possible, and indeed essential, to achieve our profitability and growth goals while operating within the legal and regulatory framework and, of course, according to the highest industry standards.

IN CONCRETE TERMS, OUR COMPLIANCE OBJECTIVES ARE WOVEN INTO OUR DAY-TO- DAY OPERATIONS THROUGH:

- a robust compliance control process, appropriate to our environment and the nature of our risks, to support the bank's growth and business development
- conformity with the fundamentals of the Compliance function, the demands of the regulator and the main international requirements applicable to our business
- a strategic, tactical and operational compliance risk management system that is understood by all our stakeholders
- rigorous monitoring, training and reporting systems for banking and prudential compliance issues.

Ultimately, the success of this process can only be envisaged if there is a team of efficient employees who are trained and aware of the issues relating to compliance.

At Rawbank, all employees working in Compliance undergo a continuous training programme and are monitored by leading institutions in the field.

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THE KEY ELEMENTS OF COMPLIANCE WITHIN THE BANK

Rawbank is one of the leading banks in the Democratic Republic of Congo and, as such, increasingly challenging compliance requirements are an essential part of its policy. Rawbank's Compliance Department constantly monitors the bank's compliance with the regulations and standards specific to the banking sector and places the trust of its clients and compliance with the legal and regulatory framework at the forefront of its activities.

Compliance allows, on the one hand, to better tackle non-compliance risks such as money laundering, protection of personal data, lack of knowledge of customers' identity (KYC - Know Your Customer), terrorism financing and, on the other hand, to avoid the damaging consequences of the occurrence of these risks such as international sanctions and embargoes.

A. Regulatory compliance

The Compliance Department continuously ensures that the bank conducts its business in compliance with the applicable legal and regulatory framework.

This necessarily involves a mechanism for identifying standards and sources of standards applicable to our business, before transposing and implementing them in the bank's strategic and operational tools (policies, procedures, etc.). This process is supported by a robust oversight programme which, among other things, ensures that the established control procedures are effective and that they are applied by the operational units.

B. Anti-money laundering

The Compliance Department's mission is to put in place systems and controls to prevent the use of our services for illicit and/or criminal purposes.

To this end, it ensures that both national and international anti-money laundering regulations are diligently applied within the bank, as well as the implementation of the standards set out by the Central Bank of Congo (BCC) in this respect.

These measures are supported by a continuous training programme for all the bank's staff and management.



C. Know your Customer (KYC)

Customer protection and identification is a strategic and sensitive part of Rawbank's Compliance programme.

Rawbank ensures the identification of clients and more generally of all its counterparties in accordance with the relevant legal and regulatory rules and principles. In this sense, the Compliance department ensures that the front office identification of customers, prior to entering into a business relationship, reasonably allows for the verification of their true identity as well as the bank's knowledge of their activities.

In this context, the KYC rules implemented by the bank also allow for operational monitoring of customer accounts and transactions to ensure that they remain in line with their activities and profiles.

Rawbank's KYC rules also cover the critical aspect of knowing our employees (Know Your Employee) as well as our counterparties (Know Your Supplier).

D. Countering the financing of terrorism

Rawbank is aware of and concerned about the rise of the threat of terrorism in the world and in Africa. The bank's compliance mechanism also takes into account the challenges of combating the financing of terrorism.

This mechanism is based on the systematic and regular filtering of our client base using the most efficient IT tools used by the industry's main players. Rawbank's Compliance teams and employees are particularly sensitive and attentive to the prevention of terrorist activities, whatever the circumstances and regardless of the stakeholders involved.

E. International sanctions and embargoes

Rawbank strictly abides by trade embargoes as well as economic and financial sanctions in order to drastically reduce operational risks resulting from the consequences of non-compliance with international sanctions. This remains one of the bank's key concerns, and it is committed to complying with local and international laws and being informed and aware of the embargoes and economic and financial sanctions in force in the markets in which Rawbank operates or with which it interacts.





F. Ethics and integrity

At the heart of Rawbank's corporate culture and in both its internal and external interactions is its commitment to upholding high standards of business ethics and integrity. Through the Compliance Department, it endeavours to maintain a high level of personal integrity and professional ethics in its dealings with customers and in the relationships between its employees and the bank in order to prevent market abuse, conflict of interest situations and corruption risks.

G. ESG

Given the significant importance of environmental issues in the world and particularly on the African continent, environmental, social and governance (ESG) criteria have become a vital component of Rawbank's strategy. Through its various sectoral policies, Rawbank is working towards integrating a standardised approach to ESG in its various programmes and establishing ESG factors as an evaluation criterion for its actions.

H. Personal data protection

Rawbank's reputation as a respected banking institution is built on the strong relationships based on mutual trust that it forges and maintains with its customers. Preserving and strengthening this trust through privacy and data protection is a strategic priority for Rawbank.

In this regard, Rawbank undertakes to comply with all the regulations in force relating to the protection of personal data. As we embark on a major digitisation of our banking services, the way in which we process the data that our customers entrust us with is a determining factor in providing them with the best services and helping them to make better decisions.

Our customers' trust is our most precious asset, and we at Rawbank do everything in our power to continue to honour it.

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COMPLIANCE MANAGEMENT IN THE BANK

A. A strategic approach, our vision of compliance

Being in compliance means knowing the laws and regulations that govern our business and abiding by them. Compliance with these laws and regulations involves all employees. Given this fact, Rawbank has developed a strategic approach based on several strong principles:

- Responsibility for preventing compliance risk is a shared responsibility at all levels of the bank's operations;
- In a complex and ever-changing regulatory environment, it is imperative that these changes are clearly and simply expressed to those they affect within the bank;
- In order to ensure a high quality of monitoring and oversight, a decentralised system for supervising compliance activities within the regions must be put in place.

The compliance function has existed since Rawbank's founding in 2002. In response to the requirements of the regulator, the Central Bank of Congo (BCC), it has evolved and been structured to integrate the prevention and detection of compliance risks into all operational practices.

B. Governance

Since the Central Bank of Congo (BCC) published Instruction No. 17, all banks are required to have a department or division entirely dedicated to compliance. The role of this department or division is to prevent and manage the risk of non-compliance within the institution.

There are currently four levels of compliance risk management at the Bank. There is the Board of Directors, through its **Ethics and Compliance Committee** and the Executive Board, through its **Compliance Committee** chaired by the Managing Director.

Then there is the **Compliance Department**, responsible for upstream risk management and prevention and downstream risk monitoring. Lastly, there are the **operating entities**, where risk prevention and detection are integrated into all procedures.

The entire compliance system (organisation, procedures, training programmes) is designed to provide an environment conducive to strengthening the bank's control system.

Ethics and Compliance Committee
(Board of Directors)

Compliance Committee
(Executive Board)

Compliance Department

Operational entities
(central and regional)

ETHICS AND COMPLIANCE COMMITTEE STRUCTURE AND ROLE

The Ethics and Compliance Committee is the Board of Director's oversight body for the compliance function. This Committee ensures that the internal organisation and the resources (technical, human and financial) made available are adequate to ensure compliance with the legal and regulatory provisions in force.

In accordance with the applicable regulations, this committee is made up of at least three members, appointed from among the non-executive directors of the bank, including at least one independent member, who also chairs the committee.

The qualifications and backgrounds of the Rawbank Ethics and Compliance Committee members are an indisputable guarantee of its credibility and efficiency.

The Committee carries out its mission independently and reports to the Board of Directors, to which it makes recommendations, as the ultimate authority of the Compliance Function.

These recommendations are intended to ensure the smooth running of compliance-related activities within the bank. The Ethics and Compliance Committee also focuses on issues of ethics, professional conduct and, more recently, corporate social responsibility.

ETHICS AND COMPLIANCE COMMITTEE MISSION

- ✓ Ensuring that all compliance-related policies and regulations are complete
- ✓ Ensuring the effective implementation of the above policy, including the necessary training
- ✓ Ensuring the compliance of the reporting institution's activities with the legislative, regulatory and administrative framework in force
- ✓ Ensuring the effective performance of the advisory and compliance oversight function
- ✓ Ensuring the independence of the ethics and compliance function
- ✓ Handling, in a strictly confidential manner, reports of suspected misconduct made by staff under the compliance whistleblower policy
- ✓ Ensuring that the principles of ethics and professional conduct are incorporated into the bank's development strategies and activities
- ✓ Ensuring that Corporate Social Responsibility risks are taken into account and observed at all levels of the bank

MEMBERS OF THE ETHICS AND COMPLIANCE COMMITTEE



CHAIRMAN

Mr. Adrien de HEMPTINNE,
Independent Director



MEMBER

Mr. Guy SAUVANET
Non-Executive Director



MEMBER

Mr. Zain RAWJI
Non-Executive Director



MEMBER

Ms. Isabelle LESSEDJINA
Independent Director



SECRETARY

Mr. Isaac KALALA
Compliance Director

COMPLIANCE COMMITTEE STRUCTURE AND ROLE

The Compliance Committee is made up of seven members, including the Managing Director as Chairman, the Managing Director of Administration and Risks (Vice-Chairman), the Compliance Director, the Commercial Director, the Banking Production Director and the Regional Directors of the KIN and SUD regions. Its role is to develop, prepare and present compliance policy and strategy proposals to the Executive Committee and to ensure the implementation of sectoral decisions taken by the Executive Committee.



COMPLIANCE DEPARTMENT STRUCTURE AND ROLE

The duties of the Compliance function encompass a wide range of aspects and areas, including

- Ensuring that the instructions and procedures for applying the Compliance Policy are put in place and adhered to
- Identifying and listing the standards in force that apply to the bank's operations and ensuring their incorporation into internal systems
- Identifying, assessing and managing compliance risk
- Managing the bank's ethics, professional conduct and reputational risk
- Implementing and managing the Bank's financial security framework, including KYC, anti-money laundering and combating the financing and proliferation of terrorism, compliance with embargoes and financial sanctions
- Centralising compliance information and incidents within the bank
- Assisting/advising management on compliance issues
- Raising awareness and training staff on compliance issues
- Communicating and interacting with authorities and other stakeholders on all compliance issues

MEMBERS OF THE COMPLIANCE COMMITTEE

CHAIRMAN

Mr. Mustafa RAWJI
Managing Director

VICE-CHAIRMAN

Mr. Christian KAMANZI
Deputy Managing Director,
Administration & Risk

MEMBRE

Mr. Isaac KALALA
Compliance Director

MEMBRE

Mr. Etienne MABUNDA
Commercial Director

MEMBRE

Mr. Jean Jacques KABWE
Banking Production Director

MEMBRE

Mr. Hugues BOSALA
Regional Director
KIN Region

MEMBRE

Mr. Arnaud COUPE

Regional Director
SOUTH Region

SECRETARY

Ms. Germaine KABENGELE
Head of Compliance Systems and Analysis

COMPLIANCE & CSR DEPARTMENT STRUCTURE AND ROLE

Since 2013, the bank's compliance management has been carried out by the **Compliance and CSR Department**, an autonomous department that is independent of the operational activity. Previously under the direct supervision of the Secretary General, this role has been taken over by a separate department since 2019.

The Compliance and CSR Department is growing steadily and now has 24 employees working in the central office at the head office and in the decentralised office in the regions.



Compliance & CSR Department operations are divided into four divisions, tasked with the analysis and strategic management of all the bank's compliance issues.

1. FINANCIAL SECURITY

This division is at the heart of Rawbank's compliance control mechanism. Its scope covers all anti-money laundering verifications; the quality of KYC data and the deployment of customer due diligence and, lastly, compliance with international sanctions and financial sanctions.

2. SYSTEMS AND ANALYSIS

This division is dedicated to the overall management of compliance risk. Its missions include the implementation of the risk management and non-compliance system, compliance analyses on products, procedures, projects and special operations, risk mapping and management, and the implementation of monitoring measures to verify the application of the compliance policy and mechanism.

3. SUPPORT AND FACILITATION

This division is in charge of facilitating the network through Regional Compliance Officers who provide support and act as a contact point for compliance issues at branch level.

4. CSR

This division aims to integrate, on a voluntary basis, all compliance issues related to the environment and citizens' well-being.

DECENTRALISATION OF THE COMPLIANCE & CSR FUNCTION

Rawbank's expansion is based on a decentralised system, which is indispensable in a huge country with a land area of 2.345 million square kilometres. Today, in 2022, the bank has a presence in 46 cities, with some 100 branches. Operations are mainly managed by five main geographically strategic hubs in the regions of Kinshasa, the West, the South, the Centre and the East.

Compliance management is an integral part of this more comprehensive decentralised system, and has proven its effectiveness. Since 2020, each of the five regions has appointed its own Regional Compliance Officer to supervise and maintain the local branch network of compliance contact points. As intermediaries between the head office and the branch network, they play an essential role in the smooth running of the system.



A Regional Compliance Officer's personal account

ALIDOR KASSO MBAYA

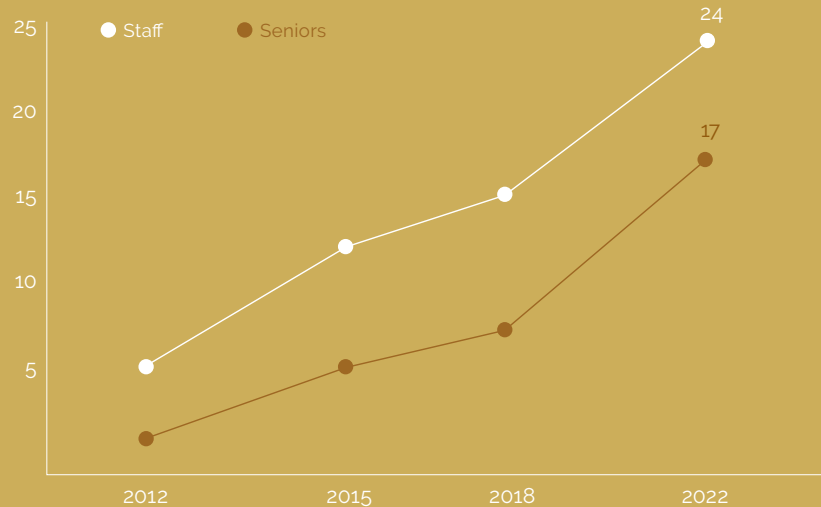
"When I joined the compliance department, Rawbank had just begun implementing the process of regionalising the compliance function. I was given the responsibility of supporting this process as Compliance Officer before being appointed Regional Compliance Officer for the East of the country.

My mission is to support the growth of the bank's activities in the region while at the same time protecting the best interests of our customers. These two areas are largely interdependent.

Employee awareness is a fundamental pillar of Compliance. It is essential that employees are trained in these issues, and in particular in the risks to which they are particularly exposed because of their occupation. Within the bank, the specific characteristics of each business line and employee category are taken into account when training is provided. Today, we use various tools to raise employee awareness: e-learning, communication on a case-by-case basis depending on the specific risks associated with each province, implementation of guidelines for applying the recommendations, etc.

This type of tailored approach is paramount to achieving results that match the bank's compliance ambitions."

THE COMPLIANCE DEPARTMENT IN NUMBERS



COMPLIANCE STAFFING:

- 5 employees in 2012 including 1 senior
- 12 employees in 2015 including 5 seniors
- 15 employees in 2018 including 7 seniors
- 24 employees to date including 17 seniors



To date,
Compliance comprises
17 seniors
representing **74%** of the
Compliance staff.

TREND IN THE NUMBER OF SUSPICIOUS TRANSACTION REPORTS SUBMITTED (SEE CENAREF):

2017 - 2019 :

+30%

2020 - 2021 :

+500%

TREND IN THE NUMBER OF INVESTIGATION CASES:

2017 - 2019 :

+64%

2020 - 2021 :

+34%

C. Technical solutions

As and when new regulatory and risk assessment requirements are introduced, Rawbank updates its procedures and tools so as to incorporate them into its operations. The entire system is regularly upgraded, be it in terms of organisation, procedures, training programmes or tools.

Rawbank has doubled its investments in recent years, particularly in state-of-the-art IT infrastructure, in an effort to continually improve the quality of its compliance oversight.

Currently, Rawbank's teams use three customer profiling and unusual transaction detection solutions to expand the surveillance measures already in place.

TECHNICAL SOLUTIONS:

SIRON, ACCUITY AND SWIFT SANCTION SCREENING.

● **SIRON**

SIRON is currently our main anti-money laundering (AML) and Know Your Customer (KYC) solution. In essence, it allows us to carry out transactional AML and KYC monitoring on the basis of predefined risk criteria. Furthermore, it enables a dynamic and real-time description of the risk level of each business relationship and the deployment of our risk-based approach towards our clients. This solution also allows us to screen the customer base against the sanction lists and the "enhanced due diligence" lists, including those compiled internally by RAWBANK.

● **ACCUITY-WORLD COMPLIANCE**

This online search tool, with close to 3,000,000 records, allows for more advanced searches as part of our enhanced customer and counterparty due diligence.

● **TRANSACTIONS SCREENING SERVICE**

A simple and effective solution for screening financial transactions against international sanctions lists in real time, prior to their acceptance.



TRAINING

Professional ethics and financial security, protecting customer interests and the bank's integrity. All these issues and requirements are at the heart of Rawbank's corporate culture. Regular training sessions are held to make employees aware of these issues.

In 2021, all of the bank's employees attended a training session on the prevention of non-compliance risks.

THIS TRAINING COMPRISED 4 MODULES:

- 1 **AML/CFT definition and challenges**
- 2 **Money laundering techniques and types**
- 3 **Money laundering risk management mechanism**
- 4 **Risk behaviour detection index**

These training sessions are indispensable to show staff that Compliance is indeed everyone's business. Rawbank staff, at all levels, are aware of the seriousness of these issues and their role in protecting the bank, its customers and its reputation.





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