



საქართველოს ეროვნული ბანკი
National Bank of Georgia

ON IMPOSING A FINANCIAL SANCTION ON THE BROKERAGE COMPANY – LTD “TBC CAPITAL” (I/N 204929961)

1 (One) fact of non-fulfillment of the Article 18 paragraph 2 sub-paragraph “b” and Article 18 paragraph 1 sub-paragraph “d” of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism” and Article 4 paragraph 2 sub-paragraph “d” of the Manual Approved by the Decree №4/04 of the President of the National Bank of Georgia on January 12, 2021 “On Implementation of Preventive Measures”. In particular, the brokerage company did not obtain permission from the management of the financial institution to establish and/or to continue business relationship with 1 (one) client, citizen of a high-risk jurisdiction. Which under the Article 5¹, Paragraph 3, sub-paragraph “d” of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 “ On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities’ Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism” against Entities and Members of their Governing Body” envisages a fine of 2 000 (Two Thousand) GEL for each fact of violation. **Total – 2 000 (Two Thousand) GEL.**

1 (One) fact of non-fulfillment of the Article 18 paragraph 1 sub-paragraph “a” and Article 4 paragraph 2 sub-paragraph “a” of the Manual Approved by the Decree №4/04 of the President of the National Bank of Georgia on January 12, 2021 “On Implementation of Preventive Measures”. In particular, in relation to 1 (one) high-risk client, the brokerage company did not study the client's business, source of wealth and source of funds. Which under the Article 5¹, Paragraph 3, sub-paragraph “g” of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 “ On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities’ Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism” against Entities and Members of their Governing Body” envisages a fine of 3 000 (Three Thousand) GEL for each fact of violation. **Total – 3 000 (Three Thousand) GEL.**

1 (One) fact of incorrect assessment of the risk of a legal entity without taking into account the risk factors determined by the Manual "On the Risk Assessment of Money Laundering and Terrorism Financing" approved by the Decree №82/04 of the President of the National Bank of Georgia on May 07, 2019 and 1 (One) fact of incorrect assessment of the risk of a natural person without taking into account the risk factors determined by the policy of the brokerage company. Which under the Article 5¹, Paragraph 3, sub-paragraph "f" of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 " On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities' Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism" against Entities and Members of their Governing Body" envisages a fine of 3 000 (Three Thousand) GEL for each fact of violation. **Total – 6 000 (Six Thousand) GEL.**

Due to 3 (Three) facts of submission of incorrect information to the National Bank by the Report Approved by the Order of the President of the National Bank №48/04 of May 05, 2016, "The Procedure for Filling out and Presenting Information About the Risk of Money Laundering and Terrorism Financing of the Brokerage Companies", which under the Article 5¹, Paragraph 4, sub-paragraph "d" of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 " On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities' Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism" against Entities and Members of their Governing Body" envisages a fine of 1 000 (One Thousand) GEL for each fact of violation. **Total – 3 000 (Three Thousand) GEL.**

1 (one) fact of non-submission of the documents, before the end of the on-site inspection period (until December 26, 2022), requested during the on-site inspection, by the agreement between the National Bank of Georgia and the Brokerage Company. In particular, after the end of the inspection period, on January 20, 2023, through the AML/CFT remote portal, the brokerage company submitted to the group of inspectors documents confirming the source of funds and source of wealth of 1 (one) natural person and 1 (one) legal entity. Which under the Article 5¹, Paragraph 2, sub-paragraph "f" of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 " On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities' Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism" against Entities and Members of their Governing Body" envisages a fine of 5 000 (Five Thousand) GEL for each information/documentation requested by the agreement. **Total – 5 000 (Five Thousand) GEL.**

THE BROKERAGE COMPANY – LTD "TBC CAPITAL" (I/N 204929961) is fined in the total amount of **19 000 (Nineteen Thousand) GEL.**



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR – INDIVIDUAL ENTREPRENEUR “GIORGI JAVAKHISHVILI” (P/N 08001006258)

A Penalty of **3 000 (Three thousand) Lari** was imposed on Currency Exchange Operator for failure to execute requirements of the Article 29 paragraph 1 and 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (a version after amendment made on April 5, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

Financial Penalty of **10 000 (Ten thousand) Lari** was imposed on the Currency Exchange Operator, as their electronic software cannot ensure the detection of noteworthy/suspicious signs and also checking of persons in the lists of politically active and/or sanctioned persons provided by the resolutions of the United Nations Security Council. Which under the Article 3, Paragraph 2, sub-paragraph ‘e’ of the Rules Approved by the Decree N17/04 of the President of the National Bank of Georgia on February 5, 2020 (a version adopted after 2021, 5 April amendment) “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of 10 000 (Ten thousand) lari.

Currency Exchange Operator – Individual Entrepreneur “Tamar Germanishvili” was fined with total amount of 13 000 Lari.



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National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- LLC "ZMEBI TAVADEBI" (I.N. 445532219)

Monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- LLC "ZMEBI TAVADEBI" (I.N. 445532219)

A Fine of 17 000 (seventeen thousand) Gel was imposed on LLc „ZMEBI TAVADEBI”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph “k” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.

During the inspection, there was revealed 1 (one) case of failure to report transaction (CTR) to Financial monitoring service, which under the Article 2, Paragraph 2, sub-paragraph “g” of the Rule Approved by the Decree №17/04 (a version after amendment made on February 5, 2020 until April 5, 2021) of the President of the National Bank of Georgia “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 1 000 (one Thousand) GEL, for each fact of violation. Total – 1 000 (one Thousand) GEL.

During the inspection, there were revealed 3 (three) cases of failure to report transaction (CTR) to Financial monitoring service, which under the Article 3, Paragraph 3, sub-paragraph “I” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 2 000 (two Thousand) GEL, for each fact of violation. Total – 6 000 (six Thousand) GEL.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "KRISTO" (I/N 448397128)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Kristo" (I/N 448397128)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism”, In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph “i” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of **3 000 (Three Thousand) GEL**.

Thus, Currency Exchange Operator was fined with the total amount of **3 000 (three thousand) GEL**.



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National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- LLC "SESILI 2020" (I.N. 448054783)

Monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- LLC "SESILI 2020" (I.N. 448054783)

A Fine of 11 000 (eleven thousand) Gel was imposed on LLC „SESILI 2020”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph “k” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.

During the inspection, there was revealed 1 (one) case of failure to report accurate information to the National Bank of Georgia under the Decree №248/04 of the President of the National Bank of Georgia, approved on November 15, 2018 “Rules on filing and submitting illicit income legalization and Terrorism Financing Risk Supervision Reports by Currency Exchange bureau” for the first half of year 2022. Which under the Article 3, Paragraph 4, sub-paragraph “D” of the Rules Approved by the Decree N17/04 (a version before amendment made on April 6, 2021) of the President of the National Bank of Georgia “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its

administrators” envisages a fine of GEL 1 000 (thousand) on each case of infringement, in total -1 000 (one thousand) lari.



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National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "SABA" (I/N 445506649)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Saba" (I/N 445506649)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism”, In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph “i” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of **3 000 (Three Thousand) GEL**.
2. Financial Penalty of 1 000 (one thousand) Lari was imposed on the Currency Exchange Operator for failure to report accurate information to the National Bank of Georgia (1 case) under the provisions of the “Rules on filing and submitting illicit income legalization and Terrorism Financing Risk Supervision Reports by Currency Exchange bureau” approved on November 15, 2018 under the Decree №248/04 of the President of the National Bank of Georgia, which under the Article 3, Paragraph 4, sub-paragraph ‘d’ of the Rules Approved by the Decree N17/04 of the President of the National Bank of Georgia on February 5, 2020 (a version adopted after 2021, 6 April amendment) “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of **1 000 (one thousand) GEL** on each case of infringement.

Thus, Currency Exchange Operator was fined with the total amount of **4 000 (four thousand) Lari**.



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National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- LLC „ROYAL 2019” (I.N. 445558717)

Monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- LLc „Royal 2019” (I.N. 445558717)

A Fine of 16 000 (sixteen thousand) Gel was imposed on LLc „Royal 2019”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari. During the inspection, A penalty of 3 000 (three thousand) was imposed on the Currency Operator for non-submission of the Initial registration Form envisaged under the Decree N1 of the Head of the Financial Monitoring Service of Georgia on 18 June, 2012 “On the Approval of Rules on Record – Keeping, Storage and Reporting of the Information on the Transaction by Obligated Entities to the Financial Monitoring Service of Georgia”, which under the Article 3, Paragraph 2, sub-paragraph ‘a’ of the Rules Approved by the Decree N17/04 (a version after the amendment made on April 5,2021) of the President of the National Bank of Georgia “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of GEL 3 000 (three thousand) lari.

failure to execute requirements of the Article 27 paragraph 6 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”. The software (electronic) system implemented in the currency exchange office for the purpose of promoting prevention of money laundering and financing of terrorism is functioning with significant deficiencies. In particular, it fails to detect suspicious/unusual/fragile transactions and the verification of persons in the lists of sanctioned and politically exposed persons, which under the Article 3, Paragraph 2, sub-paragraph ‘e’ of the Rules Approved by the Decree N17/04 (a version after the amendment made on April 6,2021) of the President

of the National Bank of Georgia “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of GEL 10 000 (ten thousand) lari.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "ROI CREDIT" (I/N 445526235)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Roi credit" (I/N 445526235)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism”, In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph “i” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of **3 000 (Three Thousand) GEL**.
2. A Penalty of **7 000 (seven thousand) Lari** was imposed on Currency Exchange Operator, as in 1 (one) case the information regarding the client and/or operation was not submitted through special program system, which according to the Article 3, paragraph 2, point “j” of the Rule Approved by the Decree N17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of **7 000 (seven thousand) GEL** on each case of infringement.

Thus, Currency Exchange Operator was fined with the total amount of **10 000 (ten thousand) GEL**.



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National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "NIKA-ZAUR" (I/N 445493733)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Nika-Zaur" (I/N 445493733)

1. Due to the non-fulfillment of the Article 29 paragraphs 1 and 2 of the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism", In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph "i" of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators" envisages a fine of **3 000 (Three Thousand) GEL**.
2. A Penalty of **7 000 (seven thousand) Lari** was imposed on Currency Exchange Operator, as in 1 (one) case the information regarding the client and/or operation was not submitted through special program system, which according to the Article 3, paragraph 2, point "j" of the Rule Approved by the Decree N17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators" envisages a Fine of **7 000 (seven thousand) Lari** on each case of infringement.
3. As a result of the inspection, it was revealed that the submission of the initial registration form to the Financial Monitoring Service had been delayed by the Currency Exchange Bureau. Delayed submission of the initial registration form Approved by the Order of the Head of the Financial Monitoring Service of Georgia № 1 of June 18, 2012, "On the Procedure for Receiving, Systematizing, Processing and Transferring Information to the Financial Monitoring Service of Georgia by Currency Exchange Bureaus" envisages a fine of 3 000 (Three Thousand) GEL.

according to the Article 3, paragraph 2, sub-paragraph “a” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators”. **Total - 3 000 (Three Thousand) GEL.**

Thus, Currency Exchange Operator was fined with the total amount of **13 000 (thirteen thousand) Lari.**



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National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "NASTIA" (I/N 448048318)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Nastia" (I/N 448048318)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism”, In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph “i” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of **3 000 (Three Thousand) GEL**.

Thus, Currency Exchange Operator was fined with the total amount of **3 000 (three thousand) GEL**.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- LLC "IRINKA" (I.N. 445568751)

Monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- LLc "IRINKA" (I.N. 445568751)

A Fine of 3 000 (three thousand) Gel was imposed on LLc „IRINKA”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.



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National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- LLC "EKSMONI" (I.N. 445439847)

Monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- LLC "EKSMONI" (I.N. 445439847)

A Fine of 15 000 (fifteen thousand) Gel was imposed on LLC „EKSMONI”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph “k” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.

During the inspection, A penalty of 3 000 (three thousand) was imposed on the Currency Operator for non-submission of the Initial registration Form envisaged under the Decree N1 of the Head of the Financial Monitoring Service of Georgia on 18 June, 2012 “On the Approval of Rules on Record – Keeping, Storage and Reporting of the Information on the Transaction by Obligated Entities to the Financial Monitoring Service of Georgia”, which under the Article 3, Paragraph 2, sub-paragraph ‘a’ of the Rules Approved by the Decree N17/04 (a version after the amendment made on April 5,2021) of the President of the National Bank of Georgia on February 6, 2020 “On Determining, imposing and enforcing

of the fines to the Currency Exchange bureau and its administrators” envisages a fine of GEL 3 000 (three thousand) lari.

During the inspection, there were revealed that in 2 (two) cases of failure to report accurate information to the National Bank of Georgia under the Decree № 248/04 of the President of the National Bank of Georgia, approved on November 15, 2018 “Rules on filing and submitting illicit income legalization and Terrorism Financing Risk Supervision Reports by Currency Exchange bureau” for the first half of year 2022. Which under the Article 3, Paragraph 4, sub-paragraph “D” of the Rules Approved by the Decree N17/04 (a version before amendment made on April 6, 2021) of the President of the National Bank of Georgia “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of GEL 1 000 (thousand) on each case of infringement, in total -2 000 (two thousand) lari.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "DALI" (I/N 445507728)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Dali" (I/N 445507728)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism”, In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph “i” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of **3 000 (Three Thousand) GEL**.
2. A Penalty of **7 000 (seven thousand) Lari** was imposed on Currency Exchange Operator, as in 1 (one) case the information regarding the client and/or operation was not submitted through special program system, which according to the Article 3, paragraph 2, point “j” of the Rule Approved by the Decree N17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of **7 000 (seven thousand) GEL** on each case of infringement.

Thus, Currency Exchange Operator was fined with the total amount of **10 000 (ten thousand) GEL**.



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National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "GRAND CASINO BATUMI" (I/N 445446330)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Grand casino Batumi" (I/N 445446330)

1. Due to the non-fulfillment of the Article 29 paragraph 2 of the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism", In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph "i" of the Rule Approved by the Decree № 17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators" envisages a fine of **3 000 (Three Thousand) GEL**.
2. Due to the non-fulfillment of the Article 27 paragraph 6 of the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism", In particular, electronic system (hereinafter – "The Software") instilled by the bureau is not able to detect related, unusual and suspicious transactions. In addition, the software cannot verify the customers, their beneficial owners, persons authorized to direct and represent legal persons, and other persons participating in the transaction against the lists of sanctioned and politically exposed persons. Which under the Article 3, Paragraph 2, sub-paragraph "e" of the Rules Approved by the Decree N17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia "On Determining, imposing and enforcing of the fines to the Currency Exchange Bureau and its Administrators" envisages a fine of **10 000 (Ten Thousand) GEL**.
3. Financial Penalty of 2 000 (two thousand) Lari was imposed on the Currency Exchange Operator for failure to report accurate information to the National Bank of Georgia (2 cases) under the provisions of the "Rules on filing and submitting illicit income legalization and Terrorism Financing Risk

Supervision Reports by Currency Exchange bureau” approved on November 15, 2018 under the Decree №248/04 of the President of the National Bank of Georgia, which under the Article 3, Paragraph 4, sub-paragraph ‘d’ of the Rules Approved by the Decree N17/04 of the President of the National Bank of Georgia on February 5, 2020 (a version adopted after 2021, 6 April amendment) “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of **1 000 (one thousand) GEL** on each case of infringement.

Thus, Currency Exchange Operator was fined with the total amount of **15 000 (fifteen thousand) Lari**.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR LTD "BERA CREDIT" (I/N 445480453)

Regarding the imposition of the monetary fine on the Currency Exchange Operator LTD "Bera credit" (I/N 445480453)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism”, In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph “i” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of **3 000 (Three Thousand) GEL**.

Thus, Currency Exchange Operator was fined with the total amount of **3 000 (three thousand) Lari**.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- INDIVIDUAL ENTREPRENEUR "REVAZ TAKIDZE" (I.N. 61002003861)

Monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- Individual Entrepreneur "REVAZ TAKIDZE" (I.N. 61002003861)

A Fine of 12 000 (twelve thousand) Gel was imposed on INDIVIDUAL ENTREPRENEUR „REVAZ TAKIDZE”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph “k” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.

During the inspection, there were revealed that in 2 (two) cases of failure to report accurate information to the National Bank of Georgia under the Decree №248/04 of the President of the National Bank of Georgia, approved on November 15, 2018 “Rules on filing and submitting illicit income legalization and Terrorism Financing Risk Supervision Reports by Currency Exchange bureau” for the first half of year 2022. Which under the Article 3, Paragraph 4, sub-paragraph “D” of the Rules Approved by the Decree

N17/04 (a version before amendment made on April 6,2021) of the President of the National Bank of Georgia “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a fine of GEL 1 000 (thousand) on each case of infringement, in total -2 000 (two thousand) lari.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- INDIVIDUAL ENTREPRENEUR "MERAB BERIDZE" (I.N. 61010007312)

monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- Individual Entrepreneur „MERAB BERIDZE” (I.N. 61010007312)

A Fine of 10 000 (ten thousand) Gel was imposed on INDIVIDUAL ENTREPRENEUR „MERAB BERIDZE”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph “k” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

REGARDING THE IMPOSITION OF THE MONETARY FINE ON THE CURRENCY EXCHANGE OPERATOR INDIVIDUAL ENTREPRENEUR "MALKHAZ DUMBADZE" (I/N 61001017788)

Regarding the imposition of the monetary fine on the Currency Exchange Operator Individual Entrepreneur "Malkhaz Dumbadze" (I/N 61001017788)

1. Due to the non-fulfillment of the Article 29 paragraph 1 and 2 of the Law of Georgia "On Facilitating the Prevention of Money Laundering and the Financing of Terrorism", In particular, policy implemented by currency exchange bureau related to internal control does not meet the requirements set by the legislation (as well as the guidelines of the National Bank), which according to the Article 3, paragraph 3, sub-paragraph "i" of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators" envisages a fine of **3 000 (Three Thousand) GEL**.
2. During the inspection period, there were revealed 4 (four) facts for non-submission of the foreign exchange operations (transactions) subject to monitoring to the "Financial Monitoring Service of Georgia". Which according to the article 3, paragraph 3, sub-paragraph "k" of the Rule Approved by the Decree №17/04 (a version adopted after 2021, 6 April amendment) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators" envisages a Fine of **8 000 (eight thousand) GEL**.
3. A Penalty of **7 000 (seven thousand) Lari** was imposed on Currency Exchange Operator, as in 1 (one) case the information regarding the client and/or operation was not submitted through special program system, which according to the Article 3, paragraph 2, point "j" of the Rule Approved by the Decree N17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators" envisages a Fine of **7 000 (seven**

thousand) GEL on each case of infringement.

Thus, Currency Exchange Operator was fined with the total amount of 18 000 (eighteen thousand) GEL.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- INDIVIDUAL ENTREPRENEUR "ZURAB KADIDZE" (I.N. 61001069199)

monetary Fine was imposed on CURRENCY EXCHANGE OPERATOR- Individual Entrepreneur "ZURAB KADIDZE" (I.N. 61001069199)

A Fine of 10 000 (ten thousand) Gel was imposed on INDIVIDUAL ENTREPRENEUR „ZURAB KADIDZE”.

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph “k” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR- INDIVIDUAL ENTREPRENEUR "VALERIAN DIASAMIDZE" (I.N. 61006033337)

A Fine of 13 000 (thirteen thousand) Gel was imposed on INDIVIDUAL ENTREPRENEUR "VALERIAN DIASAMIDZE".

Financial Penalty of 3000 (Three thousand) Lari was imposed on Currency Exchange operator for failure to execute requirements of the Article 29 paragraph 2 of the Law of Georgia "on Facilitating the Suppression of Money Laundering and Terrorism Financing", which according to the Article 3, paragraph 3, point "i" of the Rule Approved by the Decree N17/04 (amended after 2021, 6 April) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators" envisages a Fine of 3 000 (Three thousand) Lari.

In particular, in 1 (one) case, the Currency Exchange Operator had not recorded information about the client and the operation (transaction) through a special software (electronic) system, which under the Article 3, Paragraph 2, sub-paragraph "k" of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 "On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators" envisages a fine of 7 000 (Seven Thousand) GEL, for each fact of violation. Total – 7 000 (Seven Thousand) GEL.

During the inspection, A penalty of 3 000 (three thousand) was imposed on the Currency Operator for non-submission of the Initial registration Form envisaged under the Decree N1 of the Head of the Financial Monitoring Service of Georgia on 18 June, 2012 "On the Approval of Rules on Record – Keeping, Storage and Reporting of the Information on the Transaction by Obligated Entities to the Financial Monitoring Service of Georgia", which under the Article 3, Paragraph 2, sub-paragraph 'a' of the Rules Approved by the Decree N17/04 (a version after the amendment made on April 5, 2021) of the President of the National Bank of Georgia on February 6, 2020 "On Determining, imposing and enforcing

of the fines to the Currency Exchange bureau and its administrators” envisages a fine of GEL 3 000 (three thousand) lari.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

ON IMPOSING A FINANCIAL SANCTION ON THE BROKERAGE COMPANY – LTD "FIDELIS WEALTH MANAGEMENT" (I/N 405214726)

On Imposing a Financial Sanction on the Brokerage Company – LTD "Fidelis wealth management" (I/N 405214726)

6 (Six) fact of non-fulfillment of the Article 18 paragraph 1 sub-paragraph “d” of the Law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism” and Article 4 paragraph 2 sub-paragraph “d” of the Manual Approved by the Decree №4/04 of the President of the National Bank of Georgia on January 12, 2021 “On Implementation of Preventive Measures”. In particular, the brokerage company did not obtain permission from the management of the financial institution to establish and/or to continue business relationship with 6 (Six) high-risk client. Which under the Article 5¹, Paragraph 3, sub-paragraph “d” of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 “ On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities’ Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of Terrorism” against Entities and Members of their Governing Body” envisages a fine of 2 000 (Two Thousand) GEL for each fact of violation. **Total – 12 000 (Twelve Thousand) GEL.**

6 (Six) fact of non-fulfillment of the Article 18 paragraph 1 sub-paragraph “a” and Article 4 paragraph 2 sub-paragraph “a” of the Manual Approved by the Decree №4/04 of the President of the National Bank of Georgia on January 12, 2021 “On Implementation of Preventive Measures”. In particular, in relation to 6 (Six) high-risk client, the brokerage company did not study the client's business, source of wealth and source of funds. Which under the Article 5¹, Paragraph 3, sub-paragraph “g” of the Rule Approved by the Decree N35/04 (a version after amendment made on April 05, 2021) of the President of the National Bank of Georgia on February 14, 2012 “ On Determining, Imposing and Enforcing the Amount of Fines for Violations of the Securities’ Legislation, the Law of Georgia "On Accounting, Reporting and Auditing" and the law of Georgia “On Facilitating the Prevention of Money Laundering and the Financing of

Terrorism” against Entities and Members of their Governing Body” envisages a fine of 3 000 (Three Thousand) GEL for each fact of violation. **Total – 18 000 (Eighteen Thousand) GEL.**

THE BROKERAGE COMPANY – LTD “FIDELIS WEALTH MANAGEMENT” (I/N 405214726) is fined in the total amount of **30 000 (Thirty Thousand) GEL.**



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR – INDIVIDUAL ENTREPRENEUR "TAMUNA DZAGANIA" (P/N 39001041349)

Monetary Fine Was Imposed On Currency Exchange Operator – Individual Entrepreneur "Tamuna Dzaganian" (P/N 39001041349)

1. A Penalty of **3 000 (Three thousand) GEL** was imposed on Currency Exchange Operator for failure to execute requirements of the Article 29 paragraph 1 and 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) GEL;
2. As a result of the inspection, it was revealed that the submission of the initial registration form to the Financial Monitoring Service had been delayed by the Currency Exchange Bureau. Delayed submission of the initial registration form Approved by the Order of the Head of the Financial Monitoring Service of Georgia № 1 of June 18, 2012, “On the Procedure for Receiving, Systematizing, Processing and Transferring Information to the Financial Monitoring Service of Georgia by Currency Exchange Bureaus” envisages a fine of 3 000 (Three Thousand) GEL according to the Article 3, paragraph 2, sub-paragraph “a” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 06, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators”. **Total - 3 000 (Three Thousand) GEL.**

Currency Exchange Operator – Individual Entrepreneur “Tamuna Dzaganian” (P/N 39001041349) was fined with total amount of 6 000 GEL.



საქართველოს ეროვნული ბანკი
National Bank of Georgia

MONETARY FINE WAS IMPOSED ON CURRENCY EXCHANGE OPERATOR – LTD "SAKHALKHO CREDITI" (I/N 415080218)

Monetary Fine Was Imposed On Currency Exchange Operator – LTD "Sakhalkho Crediti" (I/N 415080218)

1. A Penalty of **3 000 (Three thousand) GEL** was imposed on Currency Exchange Operator for failure to execute requirements of the Article 29 paragraph 1 and 2 of the Law of Georgia “on Facilitating the Suppression of Money Laundering and Terrorism Financing”, which according to the Article 3, paragraph 3, point “i” of the Rule Approved by the Decree N17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, imposing and enforcing of the fines to the Currency Exchange bureau and its administrators” envisages a Fine of 3 000 (Three thousand) GEL.
2. Due to 2 (Two) facts of submission of incorrect information to the National Bank by the Report Approved by the Order of the President of the National Bank №248/04 of November 15, 2018, "The Procedure for Filling out and Presenting Information About the Risk of Money Laundering and Terrorism Financing of the Currency Exchange Bureau", which under the Article 3, Paragraph 4, sub-paragraph “D” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency Exchange Operators and its Administrators” envisages a fine of 1 000 (One Thousand) GEL, for each fact of violation. **Total – 2 000 (Two Thousand) GEL.**
3. During the inspection period, revealed 2 (Two) cases of non-submission of reports to the Financial Monitoring Service of Georgia, in cases above the limits of buying and selling foreign currency in cash. In relation of the mentioned operations have been violated requirements provided for in Article 6, Clause 4 of the Rule Approved by the Order of the Head of the Financial Monitoring Service of Georgia № 1 on June 5, 2020, “For Accounting, Storage and Submission of Information on the Transaction by the Accountable Person to the Financial Monitoring Service of Georgia”, which under the Article 3, Paragraph 3, sub-paragraph “K” of the Rule Approved by the Decree №17/04 (a version after amendment made on April 6, 2021) of the President of the National Bank of Georgia on February 5, 2020 “On Determining, Imposing and Enforcing of the Fines to the Currency

Exchange Operators and its Administrators” envisages a fine of 2 000 (Two Thousand) GEL, for each fact of violation. **Total – 4 000 (Four Thousand) GEL.**

Currency Exchange Operator – LTD “Sakhalkho Crediti” (I/N 415080218) was fined with total amount of 9 000 GEL.