



**CONSOLIDATED VTB GROUP POLICY CONCERNING THE
COUNTERACTION OF THE LAUNDERING OF THE PROCEEDS OF CRIME
AND THE FINANCING OF TERRORISM**

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GENERAL PROVISIONS

Involvement of financial institutions in operations related to legitimization (laundering) of the proceeds of crime and financing of terrorism leads to legal, reputation and as a consequence financial risk.

Consolidated VTB Group Policy concerning the counteraction of laundering of proceeds of crime and financing of terrorism (hereinafter referred to as the "Policy") establishes general compliance rules for anti-money laundering and anti-terrorist financing purpose in VTB Group and is aimed at minimizing the foregoing risks.

In implementing compliance measures for anti-money laundering and anti-terrorist financing purpose, the VTB Group Companies are governed by national legislation in this field and this Policy. In the event of differences between the requirements of the national legislation and this Policy, provisions of the national legislation shall be applied.

DEFINITIONS

Lead Bank	- OJSC VTB Bank;
VTB Group	- Bank and legal entities, participatory interest of the Bank in the authorized/reserve capital of which, makes more than 50% of the total number of voting shares/interest and which are credit intuitions in accordance with the law of the country they have been registered (i.e. organizations doing banking operations) – bank subsidiaries or financial institutions (i.e. organizations, which are not lending organizations but providing services in the securities market, insurance services or other financial services, as well as their management companies, unit investment trust management companies, leasing companies, other organizations performing operations in the market of financial services) - "financial branch organizations" . Bank subsidiaries and branches of financial organizations shall be jointly referred to as the "subsidiary companies";
VTB subholding	A group of Companies united geographically and/or by specific features of the line of activity, in the authorized capital of which the Subsidiary Company (Subholding Lead Company) owns more than 50% of voting shares/interest;
Public officials	- Persons, entrusted (or who were formerly entrusted) with important state functions in foreign country, for example, the heads of the states or governments, key politicians, high government officials, officials of the judicial authorities, high military officials, directors of the government owned corporations, high officials of political parties;

Compliance for the CLPC/FT purpose	- VTB Group Companies' business activity aimed at counteraction of legitimization (laundering) of proceeds of crime and financing of terrorism;
KYC	- "Know your customer" rule;
Customer	- Physical or legal entity intending to establish business relations with the VTB Group Companies or already being serviced by the Company or entering into individual transaction with the Company on its own behalf or on behalf of the third parties;
National legislation	- Legislative acts, as well as normative acts of the governmental agencies, authorized to carry out control and/or supervision of the business activity of the VTB Group Company in the CLPC/FT field;
LP/FT	- Laundering (legitimization) of proceeds of crime, which means legitimization of ownership, use, disposition of cash assets and other property acquired as a result of commission of crimes specified by the national legislation and/or financing of terrorism;
Official in charge of CLPC/FT	- A person in the VTB Group Company responsible for enforcement of internal regulatory CLPC/FT documents of the Company and their conformity with national legislation in the CLPC/FT field;
CLPC/FT	- Counteraction of legitimization (laundering) of proceeds of crime and financing of terrorism;
Authorized agency	- Public authority taking measures on counteraction of legitimization (laundering) of proceeds of crime and financing of terrorism in accordance with national legislation and receiving reports provided for by the national legislation from organizations making currency or other property transaction.
VTB Group Management Committee (VTB GMC)	Standing collegial body of the VTB Group of Companies, carrying out its activity for the purpose of coordinating activities of VTB Group of Companies, VTB Group of Companies' management efficiency upgrading and considering corporate strategy of VTB Group, including Companies being part of it. VTB GMC functions and procedures and regulations shall be governed by the VTB GMC Provision.
FATF	- Financial Action Task Force on Money-laundering– intergovernmental organization, which establishes standards, develops and encourages anti-money laundering and anti-terrorist financing policy.
Financial institution	- Legal entity carrying out one or more lines of activity enumerated in the definition of the "financial institution" contained in a glossary to 40 FATF

Recommendations.

- Dormant account
- An account, on which there was no cash flow during six or more months.

VTB GROUP GENERAL PRINCIPLES AND COORDINATION

For the purpose of integrating efforts in preventing involvement in operations related to laundering of proceeds from crime or financing of terrorism, the VTB Group of Companies agreed as follows:

- follow general provisions and approaches set forth in this Policy while creating and improving compliance system for the CLPC/FT purpose.
- develop own compliance regulations and procedures for the CLPC/FT purpose based on the national legislation and unify them (subject to the limits imposed by the national legislation) with the VTB Group standards set forth in this Policy;
- take actions aimed at reduction of risks related to involvement in schemes for laundering of proceeds from crime or financing of terrorism within the framework of VTB Group Company and VTB Group in general;
- coordinate its efforts in elaboration of measures aimed at CLPC/FT;
- participate in information exchange to spread relevant information and compliance best practices for the CLPC/FT purposes;
- render mutual assistance in solving problems related to compliance system functioning and its implementation for the CLPC/FT purposes in the event of their occurrence.

In accordance with FATF Recommendations, principles used by financial institutions to prevent involvement in money laundering operations should also be applied to the branches and subsidiaries located abroad with prevailing participatory interest, particularly in the countries that neither observe FATF Recommendations nor have adequate CLPC/FT procedures, sufficient regulatory and supervisory tools or in the countries with higher level of corruption, crime or risks of operations related to financing terrorism.

ACCOUNTING AND ANALYSIS

With view of ensuring conformity with general principles of VTB Group compliance for the purpose of CLPC/FT, maintaining sustainability of compliance system for the CLPC/FT purposes and evaluation on consolidated basis of risks related to the laundering of proceeds from crime or financing of terrorism, the VTB Group Companies shall quarterly submit reports on application of compliance regulations and procedures for the CLPC/FT purposes to the Lead Bank. Accounting form attached as Annex 1 of this Policy shall be filled out in order to submit the above mentioned report.

Responsibility for preparing and submitting reports by Subsidiary companies shall be rested on the Officials of the Subsidiary Companies in charge of CLPC/FT.

Banking Operation Monitoring Department of the Lead Bank shall carry out analysis of the reports and other information concerning functioning of compliance system for the CLPC/FT purposes, received from VTB Group Companies and on preparation of consolidated reports to be submitted to the VTB Group's management on the efficiency of the strategy implemented in the field of CLPC/FT and risks related to laundering of proceeds from crime or financing of terrorism.

The results of analysis and reports on application of compliance regulations and procedures for the CLPC/FT purposes received from VTB Group Companies and parent companies of Subholdings shall be annually brought to VTB GMC's notice in the form of annual reports.

GENERAL RESPONSIBILITIES

Establishing and ensuring functioning of compliance system for the CLPC/FT purposes, the VTB Group Companies shall be based on that:

- they are not entitled to transfer their obligations provided for by legislation to other third parties and, therefore, bear responsibility for availability and functioning of compliance system for the CLPC/FT purposes;
- responsibility for creation and efficient functioning of compliance system for the CLPC/FT purposes is rested upon the VTB Group Company's top management, unless otherwise is provided for by the national legislation;
- VTB Group Company, subject to execution of the national CLPC/FT law, by resolution of top management or as required by legislation shall ensure that official in charge CLPC/FT is working for it. Notice of the appointment of a new official in charge CLPC/FT shall be given to the Lead Bank.
- All staff members shall be familiarized with, and understand, their responsibilities and duties resulting from provisions of legislative and other statutory acts in regard to actions related to laundering of proceeds from crime and financing of terrorism;
- The VTB Group Company's top management shall be regularly given notice of the efficient compliance regulations for CLPC/FT purposes of VTB Group Company in risk management related to laundering of proceeds from crime and financing of terrorism in accordance with time-frame established by national legislation;
- VTB Group Companies shall act in accordance with internal compliance documents for the CLPC/FT purposes agreed upon with national supervisory authorities (if necessary), including:
 - Customer identification procedures (customer service due diligence) and customer base monitoring,
 - Risk management and risk assessment procedures related to laundering of proceeds from crime and financing of terrorism, as well as application of the above mentioned documents,
 - Provisions for submitting information to the Authorized agency and protection of information,
 - Provisions for record keeping,
 - Provisions for ensuring information confidentiality,
 - Personnel education (training);
- Documents specifying compliance procedures for the CLPC/FT purposes shall be regularly reviewed for the purpose of their conformity with modified requirements of the national legislation, new products and/or other modifications in the business activity of the VTB Group Company.

STATUS AND RESPONSIBILITIES OF THE OFFICIAL IN CHARGE OF CLPC/FT

VTB Group Company, subject to the national legislation on CLPC/FT, shall ensure that official in charge of CLPC/FT is working for it; he/she should have an experience and authorities sufficient to take independent decisions while he/she discharges his/her duties. Official in charge of CLPC/FT, as a rule, is at the head of the VTB Group Company division which is responsible for functioning and improvement of compliance system for the CLPC/FT purposes. In the events not contradicting national legislation, the Official in charge of CLPC/FT may combine his/her duties with other functions. Additional duties performed by this Official shall neither bring to conflict of interests nor

prevent Official in charge of CLPC/FT from adopting independent decisions on the issues of CLPC/FT.

VTB Subholding Companies subject to the national legislation on CLPC/FT shall be entitled to delegate responsibilities of the Official to the Official of the Subholding Parent Company if it is not contradicting national legislation of the country, where the company was registered.

Official in charge of CLPC/FT shall bear responsibility for observance by the VTB Group Company of the requirement of compliance in the field of CLPC/FT established by the national legislation, internal CLPC/FT documents of the Company and this Policy, as well as for organization, drawing up and submitting for approval of internal compliance documents for the CLPC/FT purposes.

Official in charge of CLPC/FT shall bear responsibility for organizing accounting procedure to the Authorized agency. He/she is entrusted with the task of immediate response to the reasonable requests to provide with information, received from the Authorized agency, as well as from the state supervisory and law enforcement authorities.

Official in charge of CLPC/FT shall annually report to the VTB Group Company's top management of the efficient actions in the field of CLPC/FT and risks existing and related to laundering of proceeds from crime or financing of terrorism. This information shall also be brought into notice of the Official in charge of CLPC/FT working for the Lead Bank.

COMPLIANCE PROCEDURES FOR THE PURPOSE OF CLPC/FT

CUSTOMER SERVICE DUE DILIGENCE

VTB Group Companies shall undertake requisite measures to become sufficiently confident that the customer is exactly that legal/physical entity it pretends to be along with measure to prove lack of legal barriers preventing provision of various services or products requested by the customer.

VTB Group Companies should undertake requisite measures to identify physical and legal entities in regard to which there are sanctions of the state or international agencies for the purpose of preventing establishment of cooperation with these entities or concluding individual transactions.

The customer shall not be identified in the events established by the national legislation, except when it has become known to the Company or the Company suspects that the business activity of the company or individual transaction is related to laundering of proceeds from crime or financing of terrorism.

VTB Group Companies also shall undertake sufficient and reasonable measures to establish a potential fact of customer's actions in the interest of the third parties and to identify persons to the benefit of which the customer is acting except as otherwise provided for by national legislation.

VTB Group Companies shall not open accounts for anonymous bank account holders.

The required customer identification shall be conducted at the earliest convenience upon his/her first approach to the Company. In exceptional circumstances, permitted by the national legislation, business relations with customer may be established before his/her identification upon relevant approval by the VTB Group Companies' top management. In these cases, risk management procedures shall provide for establishment of control for the extent and nature of relationships with such customer and cash funds received and/or available with the Company as a result of establishing relationships with customer until identification of the customer is completed.

In the course of identification of the customer, the Company shall verify the information (or its part) received from the customer by addressing to the reliable independent channels, data or information bases.

Requirements to identification of physical entities

While identification of physical entities, the Company shall establish the following information:

- Full name,
- residential address (registered address),
- date and place of birth,
- details of identification documents,
- other information required by national legislation.

Information received shall be verified on the basis of documents presented by the customer and/or using electronic databases (if such an opportunity is legally provided) or combination of the foregoing. In personal contact with the customer, the Companies shall require to present originals of any documents used for identification, make their copies (if possible). In the lack of possibility to make a copy of the original document, identification information of the customer shall be entered in electronic format, indicating which of the originals documents have been presented to have the customer identified

Documentary verification of the customer identity shall be based on the identification documents in accordance with national legislation.

If the customer identity is verified using electronic database, then this verification shall be carried out on the basis of full name of the customer, his/her date of birth and other characteristics established by national legislation.

Public officials

In regard to public officials of VTB Group Companies along with information entered for the purpose of physical entity identification:

- it is established using risk based approach whether the customer is in the category of public officials;
- approval is received from the top management to establish and maintain relationships with such customer;
- reasonable measures are taken to establish sources of wellbeing and revenue of the customer; and
- carry out thorough monitoring of public officials' transactions.

Persons who are in the category of public officials are recommended to be provided with an access to service on the basis of resolution of the Company management. The authority to determine this issue is allowed to be transferred by the Company management to the manager of the company division where this public official shall be provided with services or to the official in charge of CLPC/FT if it is provided for by the national legislation.

New and existing customers may initially fail to come within the scope of definition of public officials. VTB Group Company shall undertake reasonable and accessible measures to receive information on the possible change in the customers' status in relation to their involvement in political and state affairs.

Requirements to identification of the customers – legal entities

VTB Group Companies shall undertake reasonable measures to get an insight about form of incorporation of the customer – legal entity, its structure, shareholders, as well as sufficient additional information on the customer's business, reason of his/her interest in one or another product.

Companies shall establish the following information on customers – legal entities:

- full name,
- registration number,
- address of incorporation of the company,
- business address and whereabouts of the management bodies;
- identification number of taxpayer,
- list of the management bodies and all managers,
- other information provided for by national legislation.

Establishment by the VTB Group Companies of the shareholders of the companies – customers, participatory interest of which makes 20 and more percents, is an integral part of identification procedure. However, if there is a requirement in the national legislation to identify shareholders of legal entities with participatory interest less than 20%, and if VTB Group Company evaluates that the risk of laundering of proceeds from crime or financing of terrorism, the customer poses to is high, there might be determined to identify shareholders of legal entities with participatory interest less than 20%.

Customers - legal entities, whose shares are quoted in the organized securities market, shall be recognized as public companies, disclosing their accounting and other information. If it is established that the company of the customer is a public one, it is not required to provide information in addition to the information, as a rule, established for the purpose of identification of the customer unless it is provided for by national legislation.

VTB Group Companies shall identify organizations acting as intermediaries and when intermediaries are acting on behalf of other entities, it is necessary to identify also these entities unless otherwise (if any) is provided for by national legislation.

To conclude transactions, the Company shall have a list of persons authorized to sign customer's payment instructions and documents supporting the right of these persons to sign such instructions. Persons authorized to sign the documents shall be identified only in the events when it is required by risk assessment based approach, unless it is provided for by national legislation to identify all persons authorized to sign documents.

Requirements to identification of trustees, charity organizations and other similar institutions

In addition to information established for identification of the customers – legal entities, the VTB Group Companies shall establish the following information in regard to trustees, charity organizations, foundations and other similar institutions:

- nature and goals of business,

- country of incorporation,
- name and address of any body protecting interests or maintaining control of business activity of this organization,
- other information provided for by national legislation.

VTB Group Companies shall carry out identification of trustees (or similar entities), founders of the management (foundation and charity organization charter members, etc.), beneficiaries and other persons entitled to dispose capital and funds of the customers in accordance with identification procedure, established for physical and legal entities depending on what a person being identified is.

VTB Group Companies shall undertake relevant measures to receive required confirmation that a person, with whom the Company is establishing relations, is properly authorized by the customer and actually he/she is what he/she pretends to be.

Requirements to identification of the financial institutions

Establishing correspondence relations with financial institutions it is necessary to receive the following information in regard to them:

- full name, registration number, date of registration,
- jurisdiction of the place of registration of the financial institution and place of business of its operational division, which is intending to maintain relations with VTB Group Company, registered address and business address,
- form of legal entity's incorporation, shareholders and top management of the financial institution (including information if there are influential political persons in the management or among the shareholders),
- financial products and services offered by the financial institution and their markets,
- financial products and services that financial institutions are intending to use,
- general information on history of the financial institution,
- measures taken by financial institutions in the field of CLPC/FT.

Unless otherwise provided for by the national legislation and VTB Group Company compliance procedures, before establishing relations with financial institution, the Company shall send Questionnaire to it, if the risk level of the financial institution or the country, where it is incorporated is assessed as high. VTB Group Companies use Questionnaire attached as Annex 2 to this Policy, which might be extended by including, if necessary, additional questions and provisions. It is recommended to use model Due Diligence Repository from "Bankers Almanac" (www.bankersalmanac.com) as an additional source of information about financial institution.

VTB Group Companies refuse to establish correspondence relations with financial institutions that do not take measures on CLPC/FT. This provision is applied to foreign financial institutions incorporated in the countries (territories) entered by FATF in a list of countries (territories) that neither cooperate nor take anti-money laundering measures.

VTB Group Companies refuse to establish any relations with financial institutions that do not have representations in the countries where they are incorporated ("shell banks"), or with organizations acting on their behalf.

VTB Group Companies that have established correspondence relations with financial institutions, which in their turn have correspondence relations with other financial institutions, shall undertake requisite measures to understand business activity of the latter.

Procedures of detailed identification of the new financial institutions may vary depending on the country where financial institution is incorporated if it is provided for by the national legislation. However, as a general rule, the VTB Group Companies must have documentary evidence of:

- existing of financial institutions, which are supposed to have relations established,
- availability of license or other document, supporting a fact of centralized regulation of the business activity/supervision of the financial institution's business activity by relevant agency in the country of its incorporation,
- other information required in accordance with national legislation.

Acquisition of additional information on the customer, which is not a financial institution

For the purpose of more detailed study of the customer using risk based approach, it is recommended in addition to a standard list of information acquired in the course of identification, to receive additional information, which partially or fully includes the following:

- nature and details of business of the customer/occupation/ place of work;
- information on the addresses changed;
- assumed source and origin of the customer's funds, which shall go through VTB Group Company;
- information whether customer's transactions will be settled to its own or not only to its own benefit (fiduciary business);
- initial and existing at present source of the wellbeing/income of the customer (it is especially important in rendering customer's property (account) service);
- copies of previous and current statements of accounts;
- relations between representatives of the customer entitled to sign and beneficial owners;
- assumed volume and character of transactions, which shall be settled as a result of established relations;
- reason and purpose of opening an account or establishing relations.

In practice use of the risk-based approach allows to study customers with various degree of preciseness depending on the purpose of use, cost, volume and other parameters of products and services provided to the customer. Requirements of the VTB Group Companies to the information received about the customers shall be proportionate, sound and differentiated.

VTB Group Companies must have at their disposal complete set of information of those customers (groups/ customer categories), which are ranked as being of high risk of legitimization (laundering) of proceeds of crime and financing of terrorism and also about those customers, who are intending to use products and services classified by the Company as bearing higher risk of use for the purpose of laundering of proceeds of crime and financing of terrorism.

Renewal of the customer data

It is strongly recommended that VTB Group Companies take measures to properly renew customer data. For the purpose of maintaining current customer data, the VTB Group Companies shall not less than once in three years review and renew customers' documents and data they have at their disposal. The customer data with high level of risk shall be reviewed and renewed not less than once a year. In addition, the customer data may be reviewed and renewed as may be required in the event of performance by the customer of some significant actions (for example, resumption of usage of the services rendered by the Company, opening of a new account), as well as revealing changes in the customer's management body, in the composition of shareholders, level of risk assigned to it, etc.

CUSTOMER BUSINESS ACTIVITY MONITORING

Whereas:

- there is a general requirement to maintain relevant compliance aimed at preventing and prohibiting laundering of proceeds of crime and financing of terrorism and
- there is the requirement to give notice in the event of information or suspicion in relation to possible facts of laundering of proceeds of crime/financing of terrorism and provide information on the transactions subject to mandatory control (in some jurisdictions), the VTB Group Companies shall take whatever action is appropriate to ensure identification of operations or business activity of the customer related to laundering of proceeds of crime and financing of terrorism, as well as transactions subject to mandatory control (in relevant jurisdictions).

In addition to implementing due diligence in regard to the customers, the VTB Group Companies shall, being governed by KYC, study business activity of the customers with the aim of detecting uncommon to the customer activity in the course of maintaining relationships. If unusual situations do not have sound explanation, they may testify to their relationship to laundering of proceeds of crime or financing of terrorism. Customer's business activity and transactions monitoring during the whole period of his/her servicing shall assist in strengthening confidence that the Company is not used with the aim of legitimization of proceeds of crime or financing of terrorism.

Customer's business activity monitoring system has the following essential features:

- marking transactions and/or lines of activities of the customers requiring further study;
- immediate analysis of the reports on such transactions and/or lines of activities made by the authorized persons/person; and
- taking relevant decisions on conducting further study of customer's business activity based on the results of the analysis made.

Customer's business activity may be monitored:

- on a real-time basis in the course of operations/implementation of a certain line of activity or immediately prior to its implementation;
- in the course of subsequent monitoring of operations/ lines of activity of the customer.

In both cases uncommon operations/ lines of activity of the customer shall be easily figured out for further inquiry.

Monitoring procedure shall include analysis of types of transactions made by the customer, lines of its activity and comparison of data received and information on operations/ lines of activity of a similar group of customers.

VTB Group Companies are recommended also to introduce a system and procedures of relationships with customers, who have not come in contact with the Company during certain period of time though circumstances presuppose contacts on a regular basis and also in relation to “dormant account” so that to be ready to detect in future the facts, their activation and possible misuse.

In establishing customer’s business activity monitoring system regard is to be had to frequency, volume, turnovers and character of customer’s operations in the context of risk assigned to the customer and products/services of the Company used by it.

Customer’s business activity may be monitored in a manual and/or automatic mode. VTB Group Companies recognize importance of maintaining personnel in constant alertness since it is impossible to make such factors as employees’ intuition and personal contacts or telephone conversations with the customer automatic as well as capabilities based on practical experience to identify meaningless operations.

RISK EVALUATION

With the purpose of reduction of risks related to use of VTB Group Companies in laundering of proceeds from crime or financing of terrorism, the VTB Group Companies determine criteria used for risk evaluation.

To achieve general purpose of preventing use of VTB Group to legitimate proceeds from crime and financing of terrorism based on risk evaluation method the VTB Group:

- takes into account that a threat of laundering of proceeds from crime and financing of terrorism varies depending on the customer category, place of registration, products/services used and mode of their provision;
- allows the management to pursue a differentiated policy in relation to the customers so that the risks assumed by the customers correspond to their business activity;
- allows the top management to apply its own approach in the use of internal compliance procedures, rules, instruments in special circumstances;
- promotes building CLPC/FT system as cheap as possible.

In the course of implementation of the approach based on risk evaluation, the following measures are taken to determine the cheapest and sufficient measures for managing and leveling risks of involvement in laundering of proceeds from crime and financing of terrorism:

- risks related to laundering of proceeds from crime and financing of terrorism most typical for the Company are determined and evaluated;
- compliance instrument are created and implemented with the aim of managing and reducing risks identified and related to laundering of proceeds from crime and financing of terrorism;
- monitoring and improvement of these instruments applied is carried out.

Identifying and evaluating the foregoing risks, the VTB Group Companies shall determine procedures and criteria taking into account that the main evaluation directions shall be:

- customer database;
- products and services offered by the Company;

- Products and services provision modes used by the Company;
- Geography of the Company business activity;

With the aim of managing and reducing risks related to laundering of proceeds from crime and financing of terrorism, the following measures are taken:

- customer identification;
- gathering of additional information about customers in accordance with KYC principles;
and
- monitoring of transactions and lines of activity of the customer with the purpose of revealing reasonable grounds evidencing or allowing to assume that transactions concluded may be related to laundering of proceeds from crime or financing of terrorism.

On the basis of evaluation made by VTB Group Company on the use of one or another product of VTB Group Company by different customers, it is determined to what extent information on the customer depending on the risk assigned to it shall be verified and analyzed. It is also necessary to take into account all information gathered in the course of routine and verification work. Assessment of all information available may lead to changes in evaluation of the customer risk level.

In order to determine that risk management procedures function efficiently, it is necessary to review compliance rules for the CLPC/FT purpose on a regularly basis. In this connection the following aspects shall be taken into consideration:

- availability of relevant procedures allowing to register changes in the customer profile data revealed in the course of providing services to it;
- analysis of methods of application of one or another product with the purpose of laundering of proceeds from crime/financing of terrorism and transformation of these methods;
- appropriateness of training procedures and adequate understanding of tasks and actions in the field of CLPC/FT by the employees;
- compliance procedures monitoring (such as external and internal auditing);
- keep balance between automated and manual mode of operation and risk evaluation monitoring;
- access to the relevant management information;
- vertical state of accountability and liability;
- efficient interaction between division in charge of compliance for the CLPC/FT purpose and other divisions of the Company;
- efficient interaction with regulatory, supervisory and law enforcement authorities.

In general, risk management process shall be continuous and dynamic. In this connection the VTB Group Companies shall ensure periodic review of the risk management procedures arising in relation to laundering of proceeds from crime and financing of terrorism. Annual review of the risk assessment system related to laundering of proceeds from crime and financing of terrorism is recognized to be a recommendatory norm. Details of the analysis made, as well as changes resulting from it shall be taken into account in the annual report of the Official in charge of CLPC/FT.

REPORTING PROCEDURE

There are two type of operations, that should be reported to the Authorized body;

- operations subject to mandatory control in accordance with national legislation; and
- operations and business activity in relation to which there is an assurance, suspicion or motivated grounds for assurance or suspicion that a person doing them is related to laundering of proceeds from crime and financing of terrorism.

In view of differences in the national legislation, the VTB Group Companies have different reporting responsibilities.

At the same time, principal duties specified below make an integral part of reporting procedure of all the VTB Group Companies:

- all personnel contribute to gathering operation information to be submitted to the Authorized body,
- Official of the Company in charge of CLPC/FT shall review all internal operation reports to be submitted to the Authorized body,
- Official in charge of CLPC/FT shall submit the report to the Authorized body within the time-limit determined by the national legislation or within the shortest time possible except as otherwise is provided for by the national legislation.
- Advise of any suspicious proposals also shall be sent to the Authorized body even if the operation failed,
- All actions undertaken in relation to operations that should be reported to the Authorized body shall be subject to documentation and kept under systematic monitoring,
- Details of operations to be reported to the Authorized body and any contacts with the Authorized or other state bodies in regard to these operations shall be documented,
- Operation reports to be submitted to the Authorized body shall contain information on the customer, transaction or business activity in the scope provided for by the national legislation.

CONFIDENTIALITY

Information on the customer and their operations received as a part of implementation of compliance measures for the CLPC/FT purpose shall be confidential.

Employees of the VTB Group Companies shall not be entitled to inform the customers and other third parties of the forms, technique and methods of Company compliance procedure for the CLPC/FT purpose.

Disclosure of information that the Company has submitted report on operations and business activity of the customer to the third parties is strictly prohibited.

INFORMATION AND RECORD KEEPING

VTB Group Companies shall undertake to keep:

- Information and records containing customer data;

- Information on transactions;
- Internal and external reports on transactions subject to mandatory control and on suspicious transactions;
- Annual and other reports of the Official in charge of CLPC/FT;
- Information on transactions in relation to which it was decided not to take actions;
- Information on training events and their efficiency, namely information on:
 - dates of CLPC/FT instructions,
 - subject of training,
 - employees that undergo training,
 - testing results of employees upon graduation of training course (if any);
- Material on CLPC/FT system monitoring, in particular:
 - reports of the Official in charge of CLPC/FT to the higher management,
 - information on resolutions adopted concerning these reports and on the actions taken to implement these resolutions.

Data obtained as a result of customer identification and information on transactions shall be kept as proof of measures taken under CLPC/FT in accordance with applicable law and in order to use it as proof while carrying out an investigation by law enforcement agency.

Customer identification data shall be required to be kept not less than for five years upon termination of relations with the customer unless a longer keeping period is otherwise specified by the national legislation.

Date of termination of relations with customer is deemed to be:

- Date of performing individual transaction of the customer and date of previous transaction out of series of transactions of the customer;
- Date of termination of business relations with customer, including the date of closing of customer's account (accounts).

Information on transactions that have been reported to the Authorized body shall be kept not less than for five years from the date the transaction was signed, unless a longer keeping period is otherwise specified by the national legislation.

All internal and external reports under the framework of implementation of CLPC/FT measure shall be kept not less than for five years from the date the report was submitted unless a longer keeping period is otherwise specified by the national legislation.

Alongside with this, the VTB Group Companies shall record and keep information on all actions undertaken in order to fulfill requirement to identified transaction reports to be received from employees and submitted to the Authorized body. If official in charge of CLPC/FT determines not to submit information concerning potential fact of laundering of proceeds of crime and financing of terrorism to the Authorized body, such information shall be also kept.

PERSONNEL TRAINING

One of the most important tools used for the CLPC/FT purpose and, in particular, to reveal the facts of laundering of proceeds of crime and financing of terrorism, is availability personnel that show constant vigilance in regard to risks related to legitimization of proceeds of crime and financing of terrorism, as well as high qualification of the staff in terms of identifying customers' transactions, uncommon operations and lines of activity to be kept under mandatory control.

In this connection, employees of the relevant divisions of the VTB Group Companies shall receive adequate training with the purpose of familiarizing themselves with:

- applicable national legislation on CLPC/FT,
- regulatory documents of the national regulatory and supervisory authorities,
- compliance rules and procedures for the CLPC/FT purpose of the Company,
- potential negative consequences for the VTB Group, VTB Group Company, its personnel and customers in the event of violation of compliance regulations for the CLPC/FT purpose,
- their duties for the CLPC/FT purpose, including those related to receipt of necessary identification document, identifying suspicious transactions that might be related to laundering of proceeds of crime and financing of terrorism and giving notice of such transactions, etc.,
- information on the official in charge of CLPC/FT and his/her functional responsibilities.

It is recommended to conduct training of the relevant personnel, particularly of those directly engaged in acceptance of customers, subsequent service of customers and handling accounts not less than once a year. Based on the requirements of the national legislation the number of employees undergoing annual training may be increased.

Additional training events shall be conducted in case of modifications made in the CLPC/FT national legislation, Company compliance rules and procedures for the CLPC/FT purpose.

Employees shall undergo training adjusted for the functions they perform. Personnel engaged in attracting customers for service, servicing them, as well as employees involved directly in handling accounts take courses on different programs designed taking into account their functional responsibilities. Educational program may include explanation of importance of KYC principles and identification procedure, acquisition of additional information on the customer and its business activity monitoring for the CLPC/FT purpose.

The necessity of providing training on CLPC/FT issues arises also in transfer of staff members to another job within the Company or when changes are made in their functional duties.

FINAL PROVISIONS

This Policy shall be subject to examination by the VTB Group Management Committee. Upon approval of this Policy by VTB GMC, the VTB Group Companies shall apply its provisions in the development and improvement of compliance regulations for the CLPC/FT purpose in part not contradicting national legislation.

This Policy is made in Russian and English languages. In the event of differences in interpretation of the texts Russian version shall prevail.

Annex 1

REPORT FORM “ON VTB GROUP OF COMPANIES COMPLIANCE SYSTEM STATUS FOR THE CLPC/FT PURPOSE”

Name of VTB Group Company _____
Date of filling out _____

I. REGULATORY AND LEGAL FRAMEWORK

Changes in the national legislation	Yes	No
Have any new legislative or other normative acts been enacted during accounting period?		
Please, specify them (indicating details of legislative acts and summary of basic provisions).		
Changes in internal regulations and procedures.		
Were any changes introduced in your Company's compliance regulations and procedures for the CLPC/FT purpose during accounting period?		
Please, summarize.		

II. RISK ASSESSMENT RESULTS

Customer base	Very high risk	High risk	Average risk	Low risk	Total
Physical entity, including					
Public Officials					
Legal entities, which are not financial institutions					
Trustees, charity organizations, etc.					
Financial institutions					
Total					

Number of transactions found in the accounting period the parties to which were entities entered in the national and foreign “black” lists	
Number of messages on suspicious customer's transactions and business activity	
Total number of suspicious transactions that have been reported by the Company to the	

Authorized agency.	
Number of customers in the business activity of which there were identified suspicious transactions.	
Number of customers in regard to whom there were taken measures of termination of their suspicious transactions and/or stoppage of service.	

III. PERSONNEL TRAINING

Total number of training events held, including those with application of electronic education system	
Number of employees who had taken training courses,	
Including new employees who had taken CLPC/FT training courses upon employment in the accounting period	

IV. Technical Information Service for the CLPC/FT purpose

Were there supplied new software and hardware for the CLPC/FT purpose? Were there made any changes in the parameters and procedures of the software and hardware available with your Company for the CLPC/FT purpose in the accounting period?	Yes	No
Please, summarize.		

V. TESTING OF COMPLIANCE SYSTEM FUNCTIONING FOR THE CLPC/FT PURPOSE

Testing of compliance system functioning for the CLPC/FT purpose in the accounting period?	Yes	No
Were there conducted any testing of compliance system functioning for the CLPC/FT purpose of your Company by supervisory/regulatory authorities?		
If yes, please, indicate the name of the authority that conducted testing and describe (in brief) its conclusion and measures undertaken by the management of the Company/Official in charge of CLPC/FT with the aim of removing shortcomings, if they have been detected by supervisory authorities.		
Were there conducted any audit of compliance system functioning for the CLPC/FT purpose of your Company by internal audit division of your Company in the accounting period?		
If yes, please, describe (in brief) its opinion and measures undertaken by the management of the Company/Official in charge of CLPC/FT with the aim of removing shortcomings, if they have been detected by auditors.		
Were there conducted any audit of compliance system functioning for the CLPC/FT purpose of your Company by external auditors of your Company in		

the accounting period?		
<p>If yes, please, indicate the name of the external auditor that conducted audit and describe (in brief) its opinion and measures undertaken by the management of the Company/Official in charge of CLPC/FT with the aim of removing shortcomings, if they have been detected by auditors.</p>		

Вопросник / Questionnaire

(заполняется банками) / to be filled by banks)

I. Профиль банка /Bank's Profile

1.1.	Полное наименование /Full registered legal name	<input type="text"/>
1.2.	Краткое наименование/ Short name	<input type="text"/>
1.3.	Организационно-правовая форма/ Legal form	<input type="text"/>
1.4.	Государственный регистрационный номер / Registration number	<input type="text"/>
1.5.	Дата регистрации /Date of registration	<input type="text"/>
1.6.	Основной государственный регистрационный номер (ОГРН)/ Main state registration number (MSRN)* <i>Для организаций, зарегистрированных в РФ/ *For legal entities incorporated in the RF</i>	<input type="text"/>
1.7.	Дата присвоения ОГРН / Date of MSRN assignment	<input type="text"/>
1.8.	Орган государственной регистрации/ Registration body	<input type="text"/>
1.9.	Место регистрации / Place of registration	<input type="text"/>
1.10.	ИНН (КИО) / Tax identification number	<input type="text"/>
1.11.	Адрес места нахождения (места регистрации)/ Registered address	<input type="text"/>
		<input type="text"/>
1.12.	Адрес фактического места нахождения / Business address	<input type="text"/>
		<input type="text"/>
1.13.	Почтовый адрес / Correspondence address	<input type="text"/>
		<input type="text"/>
1.14.	Номера телефонов, факсов, адрес электронной почты / Telephone and fax numbers, e-mail	<input type="text"/>
		<input type="text"/>
1.15.	Вид лицензии на осуществление банковских операций / Type of banking license	<input type="text"/>
1.16.	Номер лицензии / License number	<input type="text"/>
1.17.	Дата выдачи лицензии / Date of issue of the license	<input type="text"/>
1.18.	СВИФТ, Телекс / SWIFT,TELEX	<input type="text"/>
1.19.	БИК / Banking identification code	<input type="text"/>
1.20.	Величина зарегистрированного и оплаченного уставного (складочного) капитала или уставного фонда, имущества / Registered and paid-in capital	<input type="text"/>

1.21.	Коды форм федерального государственного статистического наблюдения (ОКПО, ОКВЭД, ОКАТО, ОКОГУ) / Codes of state statistics monitoring (if any)	<input type="checkbox"/>
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1.22. Укажите, пожалуйста, сведения об органах управления Вашей организации и отметьте орган (органы), присутствующие по месту нахождения (месту государственной регистрации) Вашей организации / Please, provide information about your management bodies and mark those of them, which are present at your place of registration:

1.22.1.	Орган управления / Management body	Фамилия, имя, отчество (если имеется) / Surname, first name(s)	Дата рождения / date of birth
1.22.2.	Общее собрание / General meeting	<input type="checkbox"/>	<input type="checkbox"/>
1.22.3.	Совет директоров (Наблюдательный Совет) / Supervisory Council	<input type="checkbox"/>	<input type="checkbox"/>
1.22.4.	Руководитель / Chief executive officer (or equivalent)	<input type="checkbox"/>	<input type="checkbox"/>
1.22.5.	Правление (дирекция) / Board of directors	<input type="checkbox"/>	<input type="checkbox"/>
1.22.6.	Иные лица, имеющие право действовать от имени Вашей организации без доверенности / Other persons authorized to act on behalf of your company	<input type="checkbox"/>	<input type="checkbox"/>

1.23. Укажите, пожалуйста, сведения о представителе кредитной организации, уполномоченном устанавливать договорные отношения / Please, provide information about your representative, who is authorised to enter into the agreement on behalf of your bank:

1.23.1.	Фамилия, имя, отчество (если имеется) / Surname, name(s):	<input type="checkbox"/>
1.23.2.	Дата и место рождения / Date and place of birth:	<input type="checkbox"/>
1.23.3.	Гражданство (подданство) / Nationality (citizenship):	<input type="checkbox"/>
1.23.4.	Адрес места жительства (регистрации) / Residence address:	<input type="checkbox"/>
1.23.5.	Адрес места пребывания / Contact address:	<input type="checkbox"/>
1.23.6.	Сведения о документе, удостоверяющем личность (наименование, серия и номер, кем выдан (с указанием кода подразделения (если имеется)), дата выдачи, срок действия) / Identity Paper (Passport or other document (specify), serial number, validity):	<input type="checkbox"/>
1.23.7.	Место работы и занимаемая должность / Position:	<input type="checkbox"/>
1.23.8.	ИНН (при наличии) / Tax identification number (if any):	<input type="checkbox"/>
1.23.9.	Телефон, факс, адрес электронной почты / Telephone and fax numbers, e-mail address:	<input type="checkbox"/>
1.23.10	Миграционная карта (номер карты, дата начала и дата окончания пребывания) / Migration card (number of the card, date of arrival and date of departure)	<input type="checkbox"/>

- (для иностранных граждан и лиц без гражданства, находящихся на территории РФ) / for foreign citizens and stateless persons staying in Russia)
- 1.23.11. Документ, подтверждающий право на пребывание (проживание) в РФ (серия (если имеется) и номер документа, дата начала и дата окончания срока действия права пребывания (проживания)) / Visa, residence permit or other document permitting to stay (reside) in the Russian Federation (serial (if any) and number of the document, the date of commencement and the date of expiry of permission to stay in Russia) (для иностранных граждан и лиц без гражданства, находящихся на территории РФ) / for foreign citizens and stateless persons)
- 1.24. Укажите, пожалуйста, сведения о лицах, имеющих право распоряжаться денежными средствами на счёте (во вкладе) Вашей организации/ Please, provide information about the persons, who are authorized to dispose of funds on your accounts:
- 1.24.1. Фамилия, имя, отчество (если имеется)/ Surname, name(s):
- 1.24.2. Дата и место рождения/ Date and place of birth:
- 1.24.3. Гражданство (подданство) / Nationality (citizenship):
- 1.24.4. Адрес места жительства (регистрации)/ Residence address:
- 1.24.5. Адрес места пребывания /Contact address:
- 1.24.6. Сведения о документе, удостоверяющем личность (наименование, серия и номер, кем выдан (с указанием кода подразделения (если имеется)), дата выдачи, срок действия) / Identity Paper (Passport or other document (specify), serial number, validity):
- 1.24.7. Место работы и занимаемая должность/ Position:
- 1.24.8. ИНН (при наличии)/ Tax identification number (if any):
- 1.24.9. Телефон, факс, адрес электронной почты/ Telephone and fax numbers, e-mail address:
- 1.24.10. Миграционная карта (номер карты, дата начала и дата окончания пребывания)/ Migration card (number of the card, date of arrival and date of departure) (для иностранных граждан и лиц без гражданства, находящихся на территории РФ)/for foreign citizens and stateless persons staying in Russia)
- 1.24.11. Документ, подтверждающий право на пребывание (проживание) в РФ (серия (если имеется) и номер документа, дата начала и дата окончания срока действия права пребывания (проживания))/Visa,

residence permit or other document permitting to stay (reside) in the Russian Federation (serial (if any) and number of the document, the date of commencement and the date of expiry of permission to stay in Russia) (for foreign citizens and stateless persons / для иностранных граждан и лиц без гражданства, находящихся на территории РФ)

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1.25. Укажите, пожалуйста, сведения об акционерах (участниках) и бенефициарных владельцах, владеющих акциями (долями участия) в размере 10% и более/ Please, provide information about shareholders and beneficial owners holding 10% or more.

	Наименование акционера (участника) и его доля в капитале (%) / Name of shareholder and percentage of shareholding (%)	ИНН (КИО) и адрес места нахождения / Tax identification number and place of incorporation (residence), full address	Основной вид деятельности / Main type of activity	ФИО, дата и место рождения бенефициарного владельца, доля участия (%) / Name, date and place of birth of beneficial owner, % of shareholding	Адрес места жительства и род занятий бенефициарного владельца / Residence address and main type of activity of shareholding
1.25.1.					
1.25.2.					
1.25.3.					
1.25.4.					
1.25.5.					
1.25.6.					

1.26. Укажите, пожалуйста, Ваших основных корреспондентов и контрагентов./ Which institutions your major correspondents and counterparts?

	Наименование / Name of company	Место нахождения (страна, город / Place of incorporation (country, city))
1.26.1		
1.26.2		
1.26.3.		
1.26.4.		
1.26.5.		

1.27. Использует ли Ваш банк электронные и/или Интернет - технологии при предоставлении своих услуг? / Do your services include e-banking and/or Internet-banking?

Да/ Yes

Нет/ No

1.28. Имеет ли Ваш банк постоянный адрес и органы управления в государстве регистрации / Do you have a physical presence by way of real address and management bodies in the country of registration?

Да/ Yes

Нет/ No

1.29. Является ли Ваша кредитная организация дочерним или зависимым обществом? / Is your bank a branch or subsidiary of another institution?

Да /Yes

Нет/ No

1.29.1. Являетесь ли вы филиалом кредитной организации? / Is your institution a branch of a bank?

Да /Yes

 Нет/ No

1.29.2. Если да, назовите, пожалуйста, головную организацию и укажите адрес её места нахождения (регистрации)./ If yes, please, give the name and address of the head (parent) company.

1.30. Имеет ли Ваша кредитная организация филиалы и представительства, дочерние и зависимые общества?/ Does your bank have branches, subsidiaries, affiliates and representative offices?

 Да/ Yes

 Нет/ No

Если да, укажите их/ If yes, specify them:

	Наименование и основной вид деятельности/ Name of the company and its main type of activities	Место нахождения (регистрации) (полный адрес)/ Place of incorporation (full address)	ФИО руководителя/ Surname, name(s) of CEO	Обслуживающие банки/ Banks, where accounts are opened
1.30.1.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
1.30.2.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
1.30.3.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
1.30.4.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
1.30.5.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

1.31. Опишите (в общем) историю Вашей организации, деловую репутацию и сектор рынка/ Please, describe (in general) your bank's history, business reputation and market share:

II. Противодействие легализации доходов, полученных преступным путём, и финансированию терроризма./AML/CTF Controls.

2.1. Являются ли банки в Вашей стране субъектами исполнения законодательства о противодействии легализации (отмыванию) доходов, полученных преступным путём, и финансированию терроризма?/ Are banks in your home country subject to laws tailored to counter money laundering and terrorism finance?

 Да/ yes

 Нет/ no

2.1.1. Если да, то укажите, пожалуйста, законодательные и иные нормативные акты в области ПОД/ФТ, принятые в Вашей стране/ If yes, please, outline laws, rules and standards tailored in your country to prevent money laundering and terrorism financing:

2.2. Осуществляет ли какой-либо государственный надзорный/регулирующий орган надзор за применением Вашим банком требований в области ПОД/ФТ/ Is your bank subject to supervision for its anti-money laundering and terrorist financing practices by a State Supervisory/Regulatory Authority?:

Да/ yes

 Нет/ no

2.2.1. Если да, пожалуйста, укажите полное наименование и адрес Вашего надзорного/регулирующего органа/If yes, please state full name and address of your Supervisory/Regulatory Authority:

2.3. Разработаны ли в Вашем Банке правила внутреннего контроля в целях противодействия легализации (отмыванию) доходов, полученных преступным путём, и финансированию терроризма и программы его осуществления в соответствии с требованиями национальных законодательных и иных нормативных актов? / Has your Bank established internal policies, procedures and controls to ensure compliance with the obligations under the existing national legislation and regulations on prevention of money laundering and terrorism finance?

 Да/ yes

 Нет/ no

Если да, укажите их, пожалуйста/ If yes, please, outline them:

	Наименование нормативного акта/ Title of internal AML/CTF act	Дата последнего согласования с надзорным органом (если предусмотрено национальным законодательством)/ Date of last approval by supervisory authority (if provided by national legislation)	Наименование надзорного органа/ Supervisory authority
2.3.1.			
2.3.2.			

2.4. Разработаны ли в Вашем банке следующие процедуры? / Has your Bank established the following procedures?

2.4.1.	Идентификации клиентов, установления и идентификации выгодоприобретателей, изучения клиентов и контрагентов Банка/ "Know Your Customer" procedures including customer and beneficiaries identification procedures.	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no
	Включают ли процедуры Вашего банка/ Do your procedures include:		
2.4.2.	<input type="checkbox"/> Предоставление полных сведений о приказодателе (номер счета, имя/наименование, полный адрес) при выполнении переводов/ Providing full details of the ordering customer (account number, name, full address) when fulfilling payment orders.	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/no
2.4.3.	<input type="checkbox"/> Идентификацию лица, не имеющего счёта в банке, при совершении им операции с наличными денежными средствами на основе его паспорта/другого документа, удостоверяющего личность, а также хранение копии этого документа в банке/ Identifying "walk-ins" (persons that do not have accounts with the bank) by passport / ID card when accepting cash payments and retaining a copy of this document in the bank.	<input type="checkbox"/> да, во всех случаях/ yes, in all cases <input type="checkbox"/> да, если сумма превышает/ yes, if amount exceeds	<input type="checkbox"/> нет/ no
2.4.4.	Проверки информации о клиентах Банка и совершаемых ими операциях/ Checking information about the customers and their transactions	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no

2.4.5.	Выявления операций, предусмотренных законодательством о ПОД/ФТ/ Revealing transactions subject to AML/CTF legislation	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no
2.4.6.	Документального фиксирования и представления сведений, предусмотренных национальным законодательством о ПОД/ФТ, в уполномоченный орган/ Documenting the revealed information and reporting transactions according to national AML/CTF legislation to the authorized body	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no
2.4.7.	Хранения документов и информации/ Records keeping	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no
2.4.8.	Обеспечения конфиденциальности информации/ Confidentiality procedures	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no
2.4.9.	Обучения персонала по вопросам ПОД/ФТ/ Training of personnel in AML/CTF	<input type="checkbox"/> да/ yes	<input type="checkbox"/> нет/ no

2.5. Разработаны ли в Вашем банке анкеты клиентов?/ Has your Bank developed standard forms to document information about customers?

Да/ yes

Нет/ no

2.6. Оценивается ли в Вашем Банке риск осуществления клиентами легализации (отмывания) доходов, полученных преступным путём, и финансирования терроризма? / Do you have a risk focused assessment of your customers?

Да/ yes

Нет/ no

2.7. Определяет ли Ваш Банк необходимые повышенные меры должной осмотрительности (due diligence) для соответствующих категорий клиентов и групп операций, которые, по мнению Вашего Банка, связаны с повышенным риском проведения незаконных операций в Вашем Банке или через Ваш Банк? / Do you determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Bank has reason to believe that they pose a heightened risk of illicit activities at or through your Bank?

Да/ yes

Нет/ no

2.8. Установлены ли у Вашего банка процедуры, регламентирующие отношения с иностранными публичными должностными лицами? / Does your Bank have policies covering relationships with Politically Exposed Persons?

Да/ yes

Нет/ no

2.9. Применяются ли в филиалах и дочерних обществах Вашего Банка (при их наличии) правила и программы внутреннего контроля в целях ПОД/ФТ, разработанные головной организацией Банка? / Are your AML/CTF policies and practices applied to all branches and subsidiaries (if any) of your bank both in the home country and in locations outside of the home country?

Да/ yes

Нет/ no

2.10. Осуществляет ли Ответственный сотрудник по ПОД/ФТ Вашего Банка контроль за организацией и функционированием системы ПОД/ФТ в филиалах Вашего банка (при их наличии)? / Is it AMLO duty to supervise the functioning of AML/CTF controls in all your branches (if any)?

Да/ yes

Нет/ no

2.11. Открывает ли Ваш Банк счета на анонимных владельцев?/ Does your Bank open anonymous accounts to individuals and/or corporate customers?

Да/ yes

Нет/ no

2.12. Разработаны ли в Вашем Банке процедуры, должным образом обеспечивающие проведение операций только с теми банками-корреспондентами, которые обладают лицензиями на проведение банковских операций, выданными в странах их регистрации? / Do you have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of incorporation?

Да/ yes

Нет/ no

2.13. Поддерживает ли Ваш Банк корреспондентские отношения с банками, зарегистрированными в государствах и на территориях, предоставляющих льготный налоговый режим и (или) не предусматривающих раскрытие и предоставление информации при проведении финансовых операций (офшорных зонах)?/ Does your Bank have correspondent relationships with financial institutions residing in off-shore zones (off-shore zone meaning a country or a territory with preferential tax regime and/or legislation, which does not envisage disclosure of information on financial transactions)?

Да/ yes

Нет/ no

Если да, то укажите эти банки-корреспонденты/ If yes, please, name these correspondents:

2.13.1.	
2.13.2.	
2.13.3.	

12.14. Имеются ли в числе корреспондентов или контрагентов Вашего Банка банки-нерезиденты, которые не имеют на территориях государств, в которых они зарегистрированы, постоянно действующих органов управления?/ Does your Bank have "shell banks" as correspondents or counterparts?

Да/ yes

Нет/ no

2.15. Имеет ли Ваш Банк корреспондентские отношения с банками, в отношении которых имеется информация о том, что их счета используются банками, не имеющими на территориях государств, в которых они зарегистрированы, постоянно действующих органов управления?/ Does your Bank have correspondent relations with banks that open accounts to "shell banks"?

Да/ yes

Нет/ no

2.16. Осуществляет ли Ваш банк сбор и анализ информации о правилах внутреннего контроля в целях ПОД/ФТ и практике их применения финансовыми учреждениями, являющимися клиентами Вашего банка? / Does your Bank collect information and assess the AML/CFT policies or practices of its own customers which are financial institutions?

Да/ yes

Нет/ no

2.17. Существуют ли в Вашем Банке процедуры доведения до сведения соответствующих работников информации об изменениях в законодательстве или процедурах внутреннего контроля в целях ПОД/ФТ? / Do you have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?

Да/ yes

Нет/ no

2.18. Привлекает ли Ваш Банк сторонние организации для обучения персонала? / Does your Bank employ agents to carry out training functions?

Да/ yes

Нет/ no

2.18.1. Если да, то проводит ли Ваш Банк обучение данных сторонних организаций на предмет выявления и направления сообщений об операциях, сведения о которых должны представляться в государственные органы, а также ознакомления с типовыми схемами отмыwania преступных доходов с использованием продуктов и услуг Вашего Банка, изучения правил внутреннего контроля в целях ПОД/ФТ? / If yes, do you provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving your Bank's products and services and internal policies to prevent money laundering?

Да/ yes

Нет/ no

2.19. В дополнение к проверкам, проводимым государственными надзорными/регулирующими органами, проводится ли в Вашем Банке на регулярной основе оценка эффективности правил и программ внутреннего контроля в целях ПОД/ФТ подразделением внутреннего контроля или внешним аудитором? / In addition to inspections by the government supervisors/regulators, does your Bank have an internal audit function or other independent third party that assesses the effectiveness of AML policies and practices on a regular basis?

Да/ yes

Нет/ no

2.20. Применялись ли к Вашему Банку меры воздействия надзорных органов в связи с неисполнением законодательства о противодействии легализации (отмыванию) доходов, полученных преступным путём, и финансированию терроризма за последние пять лет? / Has your bank been the subject of any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorists financing in the past five years?

Да/ yes

Нет/ no

Если да, то, пожалуйста, раскройте информацию подробно/ If yes, please, provide more detailed information.

2.20.1.	
2.20.2.	
2.20.3.	

2.21. Назначен ли в Вашем Банке сотрудник, ответственный за соблюдение правил внутреннего контроля в целях противодействия легализации (отмыванию) доходов, полученных преступным путём, и финансированию терроризма и программ его осуществления? / Does your Bank have Money Laundering Reporting Officer or another senior official designated to monitor suspicious client activities and to ensure compliance of your Bank with legislation and regulatory requirements relating to prevention of money laundering?

Да/ yes

Нет/ no

Если да, укажите, пожалуйста его(её) фамилию, имя отчество (если имеется), должность, номера контактных телефонов и факсов, адрес электронной почты / If yes, please, provide his (her) full name, position, telephone and fax number & e-mail:

2.21.1. ФИО/ Full name:	<input type="text"/>
2.21.2. Должность /Position:	<input type="text"/>
2.21.3. Телефон /Telephone:	<input type="text"/>
2.21.4. Факс/ Fax:	<input type="text"/>

2.21.5. Адрес электронной почты /E-mail:

Уполномочен подписать от имени банка/ On behalf of the bank

(должность/ position)

<input type="text"/>	<input type="text"/>
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(подпись/ signature)

(ФИО/ surname, first name(s))

Печать/ Seal

Дата/
Date

<input type="text"/>	<input type="text"/>	<input type="text"/>
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