

To the Correspondent banks

May 21, 2020

PJSC Asian – Pacific Bank informs that pursuant to the requirements of the Federal Law dated 07.08.2001 No.115-FZ "On Combating Legalization of Criminal Proceeds (Money Laundering) and Terrorism Financing" as well as the other regulations and guidelines on AML / CTF, the Bank applies all available measures to prevent the legalization (laundering) of proceeds from crime and financing of terrorism, including but not limited:

- foundation of Financial Monitoring Department, which is responsible for AML/CTF questions;
- appointment of an AML Authorized Officer and authorized employees in charge with AML / CFT;
- approval of Internal Control Rules for the purpose of counteracting legalization (laundering) of proceeds from crime and financing of terrorism, which include the following programs:
 - ✓ The program for organization of work for counteracting legalization (laundering) of proceeds from crime, financing of terrorism and financing of propagation weapons of mass destruction;
 - ✓ The program for identification of customers, their representatives, beneficiaries, beneficial owners;
 - ✓ The risk management program for counteracting legalization (laundering) of proceeds from crime, financing of terrorism and financing of propagation weapons of mass destruction;
 - ✓ The program for detection of customer transactions subject to mandatory control and other suspicious transactions with money or other property in relation to which there are some suspicions that they are involved in legalization (laundering) of proceeds from crime, financing of terrorism or financing of propagation weapons of mass destruction;
 - ✓ The program for revealing of operation subject in the activities of costumers to mandatory control, operations carried out for legalization (laundering) of proceeds from crime, financing of terrorism or financing of propagation weapons of mass destruction;
 - ✓ The program for organization to conclude bank account (deposit) contracts with natural persons, legal entities and foreign organization without legal entities , suspension of certain clients instructions for transactions and termination of bank deposit contract according to the Legislation of the Russian Federation;
 - ✓ The program for organization of work in bank with client's documents and (or) information about absence of frounds for decision-making about refusal to implement a decision about operation or about refusal to conclude bank account (deposit), requests and resolution of interagency commission, which was created at the Bank of Russia.
 - ✓ The program defining the procedure for application of measures to freeze (blocking) of funds or other property of the client and the procedure for checking the presence among its clients organizations and individuals, in relation to which applied or to be applied measures for freezing (blocking) of money or other property;
 - ✓ The program regulating suspension of operations with money or other property;
 - ✓ The program defining the procedure for application of measures to freeze (blocking) of funds or other property and the procedure for checking propagation weapons of mass destruction in accordance with Article 7.5 of the Federal Law №155-FZ ;
 - ✓ The program defining the procedure for suspension of operation with money or other property in accordance with Article 7.5 of the Federal Law №115-FZ;
 - ✓ The program defining the procedure for interact with person, which entrusted with indefication (simplified indefication);
- identification of customers and its representatives, beneficiaries and beneficial owners.

- take reasonable and available under the present circumstances measures for identification of beneficial owners of the clients, and Publicly exposed persons and their relatives which are serviced by the Bank;
- renew information about clients, client's representatives, beneficiaries and beneficial owners not less than once a year, in case of occurrence of doubts in veracity and accuracy of information received earlier – during seven business days after the day of occurrence of such doubts;
- detection of mandatory control transactions, suspicious transactions, collection of additional information on the customer transactions;
- documentary fix and provide to the competent authority information about operations which are subjects of mandatory inspection, unusual transactions;
- take measures for suspending (blocking) of funds or other property, suspending of transactions;
- provide to the authorized body upon its request information about transaction of clients, beneficial owners of clients, etc. ;
- develop the list of preventive measure which aimed to minimization of counteracting legalization (laundering) of proceeds from crime and financing of terrorism and financing of propagation weapons of mass destruction;
- Provide regular trainings for the Bank/s staff according to The program for training of the Bank's staff for questions to AML/CFT and Schedule of measures for trainings.

For realization of internal control in order to AML/CFT the Bank uses technologies of transactions detecting, forming BBC of following software:

- Bank informing complex CFT-Bank, CFT-Retail Bank (vendor – CJSC "Center of Financial Technologies"»);
- KOMITA COURIER JE (vendor - CJSC «KOMITA»).

Further be advised that PJSC Asian-Pacific Bank.

- do not open accounts (take deposits) in the name of anonymous owners;
- do not establish correspondent relations with the Banks which are not take measures for counteracting legalization (laundering) of proceeds from crime, financing of terrorism and financing of propagation weapons of mass destructon;
- do not establish and maintain relations with non-resident banks which don't have permanent permanent regulatory bodies in countries of incorporation;
- do not establish and maintain relations with non-resident banks in relation to which there is some information that their accounts are used by the banks which don't have permanent regulatory bodies in countries of incorporation.

In connection with the amendments to the Federal Law dated 07.08.2001 No.115-FZ "On Combating Legalization of Criminal Proceeds (Money Laundering) and Terrorism Financing" entering into force from 30.06.2013 we hereby inform that "Asian-Pacific Bank" (PJSC) is an issuer of securities eligible for trade on organized (regulated) financial markets, and discloses information in accordance with the legislation of the Russian Federation on securities.

Consequently, in accordance with subparagraph 2 of paragraph 1, Article 7 of the Federal Law № 115-FZ the Bank has the right not to provide information about its beneficial owners.

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