

AML/CFT Questionnaire of Bank BelVEB OJSC

25, May 2022

Corporate (complete official) name of the Bank in Russian	<i>Открытое акционерное общество «Белвнешэкономбанк»</i>
Contracted name of the Bank in Russian	<i>ОАО «Банк БелВЭБ»</i>
Corporate (complete official) name of the Bank in English	<i>Belvnesheconombank Open Joint Stock Company</i>
Contracted name of the Bank in English	<i>Bank BelVEB OJSC</i>
Legal status	<i>Open Joint Stock Company</i>
Registration number	<i>No. 24</i>
Country of registration	<i>Republic of Belarus</i>
Date of registration	<i>12 December 1991</i>
Name of registering agency	<i>National Bank of the Republic of Belarus</i>
License details (number, issue date, issuing agency)	<p><i>License of the National Bank of the Republic of Belarus No. 6 dated 21 December 2018 to perform banking operations;</i></p> <p><i>Special Permit (License) of the Ministry of Finance of the Republic of Belarus No. 02200/5200-1246-918 to perform professional and stock exchange transactions with securities, valid until 29 July 2022;</i></p> <p><i>Special Permit (License) of the Ministry of Finance of the Republic of Belarus No. 02200/21-00884 to perform transactions with precious metals and stones, valid until 22 June 2025.</i></p>
Domicile (registered office)	<i>29, Pobeditelei Ave., Minsk, Republic of Belarus</i>
Mailing address	<i>29, Pobediteley Ave., 220004 Minsk, Republic of Belarus</i>
Contact telephone and fax numbers	<p><i>Tel. : (+375 17) 215-61-15</i></p> <p><i>Fax: (+375 17) 309-62-12</i></p>
E-mail address	<i>office@bveb.minsk.by</i>
Website address	<i>www.belveb.by</i>
BIC and country identifier code (similar unique identification attribute)	<i>BELBBY2X</i>
S.W.I.F.T.	<i>BELBBY2X</i>
Telex	<i>252194 BVB BY</i>
Payer's identification number (similar unique identification attribute)	<i>100010078</i>
Registered share capital	<i>Registered and paid-in share capital of Bank BelVEB OJSC stands at BYN 117,407,500</i>
Number of employees	<i>1,189 (as of 01 January 2022)</i>
Stand-alone units and branches of	<i>The network of the Bank's local offices is comprised</i>

the Bank and their number	<i>of 31 service offices in Minsk and large cities of the country</i>
Representative offices of the Bank and their number	<i>None</i>
Subsidiaries and associated companies of the Bank and their number	<ul style="list-style-type: none"> • <i>BelVEB Insurance Company, Republic of Belarus (the holding of Bank BelVEB OJSC in the company's share capital – 100%);</i> • <i>VEB Technologies Limited Liability Company, Republic of Belarus (the holding of Bank BelVEB OJSC in the company's share capital – 99.9%);</i> • <i>BelVEB IT Company, Republic of Belarus (the holding of Bank BelVEB OJSC in the company's share capital – 100%);</i> • <i>DFS Company, Republic of Belarus (the holding of VEB Technologies in the company's share capital – 99.9%);</i> • <i>Sivelga Associated Closed Joint Stock Company, Republic of Belarus (the holding of Bank BelVEB OJSC in the company's share capital – 25.002%).</i>
If the Bank is part of a banking group, please give details of the name of such group	<p><i>Bank BelVEB OJSC is part of Vnesheconombank Group (Moscow)* incorporating subsidiaries, the business of which is aimed at implementing the provisions set forth in Federal Law of the Russian Federation No. 82-FZ 'On the Bank for Development' dd. 17 May 2007.</i></p> <p><i>*This wording has no legal status and is not in line with the definition of 'banking group' or 'financial and industrial group' pursuant to Russian and Belarusian laws</i></p>
Information on the supervisory authority of the country of the Bank's domiciliation (name, location)	<i>National Bank of the Republic of Belarus 20, Nezavisimosti Ave., Minsk, Republic of Belarus</i>
<p>Does the supervisory authority conduct inspections of the Bank's compliance with AML/CFT regulations?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please state frequency of such inspections</p>	<p><i>The National Bank of the Republic of Belarus conducts inspections at intervals stipulated by the legislation of the Republic of Belarus.</i></p>
History, business reputation, banking specialization, information on the size of the market segment controlled, competition, reorganization, changes in activities etc.	<i>http://www.bveb.by/about/about/</i>
Bank's ratings	<i>http://www.bveb.by/about/international-rating/</i>
Name of auditors	<i>Ernst & Young</i>

Date of last audit	March 2022
Information on the Bank's governing bodies (structure of governing bodies, as well as first names, patronymics (if applicable) and surnames of natural persons being members of such executive body (bodies))	<p><i>The governing bodies of the Bank:</i></p> <p><u>1. General Meeting of Shareholders</u></p> <p><u>2. Supervisory Board</u></p> <p><i>Mikalai Luzgin - Deputy Chairman of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Konstantin Vyshkovsky - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Anna Matelskaya - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Aleksey Miroshnichenko - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Vyacheslav Ogorodnykov - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Roman Fomin - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Natalya Prasolova - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Yuri Martynov - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Tatyana Polegoshko - Member of the Supervisory Board of Bank BelVEB OJSC;</i></p> <p><i>Alexey Kechko - Member of the Supervisory Board of Bank BelVEB OJSC.</i></p> <p><u>3. Management Board</u></p> <p><i>Vasil Matsiusheuski - Chairman of the Management Board;</i></p> <p><i>Taras Nadolnyi - First Deputy Chairman of the Management Board;</i></p> <p><i>Dzmitry Leudanski - Deputy Chairman of the Management Board;</i></p> <p><i>Viktar Perepelitsa - Deputy Chairman of the Management Board;</i></p> <p><i>Anatol Barisevitch - Deputy Chairman of the Management Board;</i></p> <p><i>Anatol Paulovich - Member of the Management Board;</i></p>
First name, patronymic (if applicable) and surname of the Chief Executive Officer of the Bank	<i>Vasil S. Matsiusheuski</i>
First name, patronymic (if applicable) and surname of the Chief Accountant of the Bank	<i>Olga S. Turbina</i>
Information on the presence or absence at its location of the Bank, its permanent management body, any other body or person that is empowered to act on behalf of the Bank without a Power of Attorney	<i>Present at the Bank's location.</i>
Information on founders	<i>On 17 September 1991, the Council of Ministers of the BSSR adopted Resolution No. 354 dd.</i>

	<p>17 September 1991 'On Establishing Joint Stock Commercial Bank for Foreign Economic Affairs of the BSSR'.</p> <p>The Bank's founders were as follows: the Government of the Republic of Belarus, Vnesheconombank (Moscow), Evrofinance (Moscow); Commercial Bank Eurobank (Paris); and JSC Atlant (Minsk).</p>
Information on shareholders holding a stake of over 1% in the share capital	<p>State Corporation 'Bank for Development and Foreign Economic Affairs (Vnesheconombank)' (97.52 %) – Moscow, Russian Federation.</p> <p>Vnesheconombank is a state corporation established by the Russian Federation. Its status, goals, functions and powers are laid down in Federal Law of the Russian Federation No. 82-FZ 'On the Bank for Development' dd. 17 May 2007.</p> <p>Minsk City Territorial Fund of State Property (2.29%) – Minsk, Republic of Belarus.</p>
Information on beneficial owners (first name, patronymic (if applicable) and surname, place of residence (registration), personal number of the Republic of Belarus resident, payer's identification number, holding in the company's share capital)	<p>There are no beneficial owners from among individuals.</p>
<p>Is the Bank's CEO a founder of (participant in) other bodies corporate with a stake in the share capital exceeding 25% or an owner of other bodies corporate, including banks?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please give details of such bodies corporate (name, its domicile (registered office), payer's identification number)</p>	
<p>Are founders of (participants in) the Bank, who hold a stake in the share capital exceeding 25%, owners or beneficial owners, founders of (participants in) other bodies corporate, including banks with a stake in their share capital of over 25%, owners or CEOs of other bodies corporate?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Are there AML/CFT legal and other regulatory acts adopted in the country of the Bank's registration?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Has the Bank adopted regulatory documents governing internal control policies and procedures in accordance with national AML/CFT regulations?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Has the Bank appointed a Compliance Officer in charge of the compliance with internal control policies and procedures designed in line with national AML/CFT regulations?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please give the following details:</p>	
His/her first name, patronymic (if applicable) and surname	Taras Nadolnyi

Position, title	<i>First Deputy Chairman of the Management Board</i>
Telephone, fax	<i>+375 17 309-64-69</i>
e-mail address	<i>TY.Nadolniy@BELVEB.BY</i>
Has the Bank adopted documents setting forth the regulations on preventing and revealing suspicious financial transactions as well as reporting information on suspicious financial transactions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Has the Bank established a structural division carrying out an assessment of the Bank's AML/CFT measures on a regular basis? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Has the Bank brought in the regulations setting forth relations with foreign public officials, officials of international organizations, as well as public officials of the Republic of Belarus? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the Bank check potential customers against the list of persons and entities implicated in terrorist activities? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Has the Bank adopted document retention procedures pursuant to the legislation in force and effect? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Retention period for customer identification documents	<i>Five years from the date of terminating contractual relations with a customer.</i>
Retention period for documents with regard to customer-generated financial transactions subject to special control under national AML/CFT regulations	<i>The Bank retains the documents relating to the execution and/or performance of financial transactions subject to special control during a period of at least five years from the date of executing such financial transactions.</i>
Do stand-alone units and branches of the Bank (if any) apply AML/CFT internal control policies and procedures? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Has the Bank adopted procedures for documenting suspicious financial transactions and reporting such information to designated financial monitoring agencies? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the Bank carry out identification of persons conducting financial transactions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the Bank assess risks of customer-generated financial transactions related to money laundering and terrorist financing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the Bank take additional measures to exercise control over certain categories of customers and types of transactions that in the Bank's opinion may expose it to a heightened risk of conducting financial transactions related to laundering proceeds of crime and financing terrorism in the Bank or via the Bank? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the Bank collect and analyze information on the activities of the Bank's customers? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the Bank collect and analyze information on AML/CFT measures taken by financial institutions from among its customers and their practical application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Has the Bank adopted the procedures for revealing and registering transactions subject to special control pursuant to the national legislation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the Bank provide AML/CFT training for its staff? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the Bank keep documents on trainings, including records on attendance and relevant training materials? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the Bank inform its staff of new laws and/or changes in the existing AML/CFT regulations? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the Bank employ third parties for the purpose of performing some of the Bank's functions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the Bank maintain accounts with banks that are registered in tax-haven countries and territories and/or do not disclose or provide information when conducting financial transactions (offshore zones)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the Bank maintain correspondent relations with banks that have no physical presence in a country (so-called 'shell banks')? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the Bank maintain accounts for anonymous holders? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has the Bank been subject to any sanctions over the last three years on account of breaches of AML/CFT regulations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Viktar A. Perepelitsa

Deputy Chairman of the Board
Bank BelVEB OJSC

