

**QUESTIONNAIRE OF JOINT-STOCK COMPANY «ALFA-BANK»**

Section 1. General information

1.1.	Full and short name (if applicable)	<i>JOINT-STOCK COMPANY «ALFA-BANK» JSC «ALFA-BANK»</i>
1.2.	Legal-organizing form	<i>Joint-Stock Company</i>
1.3.	Form of ownership	<i>private</i>
1.4.	Bank location	<i>100 Velyka Vasylkivska str. 03150, Kyiv, Ukraine</i>
1.5.	Identification code according to EDRPOU	<i>23494714</i>
1.6.	Date and place of state registration	<i>March 24<sup>th</sup>, 1993 Administrative Authority of Shevchenko District, city of Kyiv</i>
1.7.	Number of entry in the Unified state register of legal entities, individual entrepreneurs and public organizations	<i>№1 074 120 0000003231</i>
1.8.	Type (types) of economic activities (KVED-2010)	<i>64.19 Other types of monetary intermediation</i>
1.9.	Filing in the State register of banks (authority, number, date)	<i>National Bank of Ukraine, №158, 24.03.1993</i>
1.10.	Licenses (permits) for certain operations (activities)	<i>Banking license № 61 dated October 05, 2011, which entitles to render banking services set out in part three of article 47 of the Law of Ukraine "On banks and banking"</i>
1.11.	Eligible operations	<i>All the operations listed in the Banking license № 61</i>
1.12.	Contact details	<i>Correspondent banking: Tel.: +380 44 499 67 40 E-mail: <a href="mailto:Olga.Kharina@alfabank.kiev.ua">Olga.Kharina@alfabank.kiev.ua</a>, <a href="mailto:fi_corbnk@alfabank.kiev.ua">fi_corbnk@alfabank.kiev.ua</a>.</i>  <i>Settlements operations: Tel.: +380 44 490 46 91 E-mail: <a href="mailto:Sergey.Dorma@alfabank.kiev.ua">Sergey.Dorma@alfabank.kiev.ua</a></i>  <i>Treasury operations support: Tel.: +380 44 490 46 21 E-mail: <a href="mailto:ACHernichenko@alfabank.kiev.ua">ACHernichenko@alfabank.kiev.ua</a></i>
1.13.	Bank's code (MFO)	<i>300346</i>
1.14.	SWIFT	<i>ALFAUAUK</i>
1.15.	REUTERS DEALING	<i>ALFK</i>
1.16.	Official web site	<i><a href="http://www.alfabank.ua/en">www.alfabank.ua/en</a></i>

Section 2. Information on structure and market position

2.1.	Persons authorized to manage accounts and/or property	<i>In accordance with the current List of authorized signatures</i>
2.2.	Data on the management bodies and their composition	<b>Supervisory Board:</b> <i>- Roman Shpek – Chairman of the Supervisory Board;</i>

		<ul style="list-style-type: none"> <li>- Petr Aven – Member of the Supervisory Board;</li> <li>- Ildar Karimov – Member of the Supervisory Board;</li> <li>- Andrew Baxter – Member of the Supervisory Board;</li> <li>- David Mark Brawn - Member of the Supervisory Board;</li> <li>- Ernest Galiyev – Member of the Supervisory Board;</li> <li>- Adnan Anacali – Member of the Supervisory Board;</li> <li>- Vladimir Voeykov – Member of the Supervisory Board;</li> <li>- Viktor Lysenko – Member of the Supervisory Board;</li> <li>- Davydovych Ievgen – Member of the Supervisory Board.</li> </ul> <p><b>Management Board:</b></p> <ul style="list-style-type: none"> <li>- Viktoriya Mykhailo – Chairman of the Management Board;</li> <li>- Vitali Dydyska – Member of the Management Board;</li> <li>- Polina Kharchenko – Member of the Management Board;</li> <li>- Dmitry Serezhin – Member of the Management Board;</li> <li>- Alexander Lukanov – Member of the Management Board;</li> <li>- Rafal Marcin Juszcak – Member of the Management Board;</li> <li>- Svitlana Cherkay – Member of the Management Board;</li> <li>- Robert Andrzej Dzialak – Member of the Management Board;</li> <li>- Rostyslav Matiash – Member of the Management Board;</li> <li>- Andrii Hrytseniuk – Member of the Management Board;</li> </ul>
2.3.	Data on individuals which are the ultimate beneficiary owners* (last name, first name and patronymic (if available), citizenship and permanent residence, date of birth, nature and extent (level, degree, share) of beneficial ownership (benefits, interests, influence);	<p><i>Mr. Mikhail Fridman</i>  <i>Citizenship: State of Israel, Russian Federation</i></p> <p><i>Permanent residence:</i>  <i>Athlone House, Hampstead lane, London, United Kingdom, N6 4RU</i></p> <p><i>Date of birth: April 21, 1964</i>  <i>Share of beneficial ownership: 32,8632%</i></p> <p><i>More information about the Ultimate beneficial owners can be found at the links:</i>  <a href="https://alfabank.ua/ua/investor-relations/structure">https://alfabank.ua/ua/investor-relations/structure</a></p> <p><a href="https://alfabank.ua/investor-relations/documents">https://alfabank.ua/investor-relations/documents</a></p>

2.4. Information on substantial holders in the Bank:					
<i>No</i>	<i>Full name of individual or legal entity</i>	<i>Type of person (NP – natural person, LE – legal entity)</i>	<i>Information on person</i>	<i>Type of substantial shareholding (D- direct, I- indirect)</i>	<i>Description of the person-bank relationship, %</i>
1	<i>ABH Ukraine Limited</i>	<i>LE</i>	<i>Address: Themistokli Dervi, 5, Elenion Building, 2nd floor, P.C. 1066, Nicosia, Cyprus</i>  <i>Registration number: 167526</i>	<i>D</i>	<i>ABH Ukraine Limited is the shareholder of the Bank, which owns 42.3994% of the Bank's shares.</i>
2	<i>ABH Holdings S.A.</i>	<i>LE</i>	<i>Address: 3, boulevard du Prince Henri, L-1724 Luxembourg, Luxembourg</i>  <i>Registration number: B 151018</i>	<i>D, I</i>	<i>ABH Holdings S.A. is the shareholder of the Bank, which owns 57.6006 % of the Bank's shares.</i>  <i>ABH Holdings S.A. is the sole shareholder of the ABH Ukraine Limited, which owns 42.3994% of the Bank's shares.</i>
3	<i>Mikhail Fridman</i>	<i>NP</i>	<i>Nationality: State of Israel, Russian Federation</i>  <i>Place of residence: United Kingdom of Great Britain and Northern Ireland.</i>	<i>I</i>	<i>Mikhail Fridman owns 32.8632 % of the share capital of the ABH Holdings S.A., which owns 57.6006 % of the Bank's shares and is the sole shareholder of the ABH Ukraine Limited, which owns 42,3994% of the Bank's shares.</i>
4	<i>German Khan</i>	<i>NP</i>	<i>Nationality: State of Israel, Russian Federation</i>  <i>Place of residence: United Kingdom of</i>	<i>I</i>	<i>German Khan owns 20.9659 % of the share capital of the ABH Holdings S.A., which</i>

			<i>Great Britain and Northern Ireland.</i>		<i>owns 57.6006 % of the Bank's shares and is the sole shareholder of the ABH Ukraine Limited, which owns 42,3994% of the Bank's shares.</i>
5	<i>Alexey Viktorovich Kuzmichev</i>	<i>NP</i>	<i>Nationality: Cyprus, St. Kitts and Nevis, Russian Federation.  Place of residence: United Kingdom of Great Britain and Northern Ireland.</i>	<i>I</i>	<i>Alexey Kuzmichev owns 16.3239 % of the share capital of the ABH Holdings S.A., which owns 57.6006 % of the Bank's shares and is the sole shareholder of the ABH Ukraine Limited, which owns 42,3994% of the Bank's shares.</i>
6	<i>Petr Olegovich Aven</i>	<i>NP</i>	<i>Nationality: The Republic of Latvia, Russian Federation  Place of residence: Russian Federation, Moscow.</i>	<i>I</i>	<i>Petr Aven owns 12.4018 % of the share capital of the ABH Holdings S.A., which owns 57.6006 % of the Bank's shares and is the sole shareholder of the ABH Ukraine Limited, which owns 42,3994% of the Bank's shares.</i>

*More detailed information on the ownership structure is published at the link:  
<https://alfabank.ua/en/investor-relations/structure>*

2.5.	Information on belonging of the persons, referred to in the clauses 2.1-2.3, to Politically Exposed Persons (PEPs), to members of their families or to persons, associated with PEPs*	<i>Yes 1) Roman Shpek He was a People's Deputy of Ukraine, II convocation (1994-1997) 2) Petr Aven Since the fall of 1991, he was the First Deputy Minister of Foreign Affairs of the Russian Federation, in January-December 1992 - Minister of Foreign Economic Relations of the Russian Federation</i>
2.6.	Information on the parent company, corporation, holding company, industrial-financial group or other association which the customer belongs to, subsidiaries	<i>JSC «ALFA-BANK» is a part of the private investment holding company ABH Holdings S.A. (ABHH), B151018, headquartered in</i>

		<i>Luxembourg</i>
2.7.	Information on separate structural subdivisions (if applicable)	<i>As at 01.07.2021 JSC «ALFA-BANK» has 203 standard branches in Ukraine.</i>
2.8.	Standard payment instructions:	
<b>Currency</b>	<b>Correspondent bank</b>	<b>Account</b>
USD	<b>JP Morgan Chase Bank</b> New York, USA SWIFT: CHASUS33	400 940 442*
USD	<b>Citibank N.A.</b> New York, USA SWIFT: CITIUS33	36393619*
USD	<b>The Bank of New York Mellon</b> New York, USA SWIFT: IRVTUS3N	890-0720-093
USD	<b>Deutsche Bank Trust Company Americas</b> New York, USA SWIFT: BKTRUS33	04407000*
EUR	<b>ING Belgium NV/SA</b> Brussels, Belgium SWIFT: BBRUBEBB010	BE91301010494976*
EUR	<b>Deutsche Bank A.G.</b> Frankfurt am Main, Germany SWIFT: DEUTDEFF	947402400*
EUR	<b>Commerzbank AG</b> Frankfurt am Main, Germany SWIFT: COBADEFF	400886465400*
EUR	<b>Raiffeisen Bank International AG</b> Vienna, Austria SWIFT: RZBAATWW	001-55.054.431/EUR
CAD	<b>Citibank N.A., London</b> London, GB SWIFT: CITIGB2L Account no. 0360 01 2329189 with Toronto Dominion Bank Toronto, Canada SWIFT: TDOMCATTOR	10352837*
CHF	<b>Credit Suisse (Schweiz)AG</b> Zurich, Switzerland SWIFT: CRESCHZZ80A	0835077916913010
CNY	<b>Citibank N.A., London</b> London, GB SWIFT: CITIGB2L Account no. 61745081 with Citibank NA Hong Kong, Hong Kong SWIFT: CITIHKHX	10356727*
JPY	<b>Sumitomo Mitsui Banking Corporation</b> Tokyo, Japan SWIFT: SMBCJPJT	4432
GBP	<b>Citibank N.A., London</b> London, GB SWIFT: CITIGB2L	10352853*
PLN	<b>mBank S.A.</b> Warsaw, Poland SWIFT: BREXPLPW	PL 63114000000000112142001002
BYN	<b>Closed Joint-Stock Company "Alfa-Bank"</b> Minsk, Republic of Belarus	BY60 ALFA 1702 0802 0501 1027 0000

	<i>SWIFT: ALFABY2X</i>	
<i>RUB</i>	<b>Joint Stock Company “ALFA-BANK”</b> <i>Moscow, Russian Federation</i> <i>SWIFT: ALFARUMM</i>	<i>30111810300000000199</i>
<i>KZT</i>	<b>JSC SB ALFA-BANK</b> <i>Kazakhstan, Alma-Ata</i> <i>SWIFT: ALFAKZKA</i>	<i>KZ379470398000169118</i>
<i>UAH</i>	<i>Correspondent account № UA033000010000032000102001026 with The National Bank of Ukraine</i>	
<i>*Not used by LORO-correspondents</i>		
2.9.	History, reputation, market sector and competition (evidences of the financial organization existence (e.g. link at the Banker Almanac) information on reorganization, change of business type, former financial issues, reputation at the domestic and international markets, market presence, competitive positions and market share, banking product specialization etc.)	<p><i>JSC “ALFA-BANK” (hereinafter - the Bank) is a Ukrainian bank with foreign capital that has a universal business development model and renders the full range of modern financial services to individuals and legal entities. The Bank holds the leading positions in all segments of the banking market in Ukraine.</i></p> <p><i>JSC “ALFA-BANK” was founded in 1992 and since 2001 it operates under the brand “Alfa-Bank”. Since 2004 the Bank was included to a privately owned multinational banking holding company ABH Holdings S.A. (ABHH), based in Luxembourg.</i></p> <p><i>ABHH has investments in number of banking markets on the territory of the CIS and Europe, including in Ukraine, the Russian Federation, Kazakhstan, Belarus and the Netherlands.</i></p> <p><i>ABHH is a part of privately owned financial-investment consortium Alfa Group. Alfa Group is not a legal entity but a combination of independent businesses, operating mainly in the CIS countries. UniCredit Group, the Italian banking group spanning over 17 countries, became a minority shareholder of ABHH in October 31, 2016.</i></p> <p><i>In accordance with the reorganization procedure by the way of merging of JSC “Ukrsotsbank” to JSC “ALFA-BANK” since October 15, 2019, JSC “ALFA-BANK” became a successor of property, rights and obligations under contracts and agreements concluded by JSC “Ukrsotsbank” previously.</i></p> <p><i>As of June 01, 2021 the Bank is in the TOP-6 in the terms of assets according to the National Bank of Ukraine ranking.</i></p>
2.10.	Financial organization’s rating score (international and domestic) (if applicable)	<p><i>JSC “ALFA-BANK” has assigned the following ratings from the international and national rating agencies:</i></p> <p><b><i>Fitch Ratings</i></b> <b><i>International scale rating</i></b> <i>Long-term Issuer Default Rating in foreign currency: B- (outlook – Stable);</i> <i>Long-term Issuer Default Rating in national currency: B- (outlook – Stable);</i></p>

		<p><i>National scale rating</i>  <i>Long-term rating: BBB+(ukr) (outlook – Stable).</i></p> <p><i>Expert-Rating</i>  <i>National scale rating</i>  <i>Long-term rating: uaAAA.</i></p>
2.11.	Statutory capital amount	UAH 28,726,247,548.40

Section 3. Information on measures taken by the financial organization aimed to prevent money laundering of illegally obtained funds.

3.1.	Internal regulatory documents and procedures of internal control aimed to prevent money laundering of illegally obtained funds and reporting of such operations to regulatory authorities	<p>1. JSC “ALFA-BANK” policy on prevention and counteraction to legalization (laundering) of proceeds from crime, terrorist financing and financing of proliferation of weapons of mass destruction.</p> <p>2. Rules of financial monitoring of JSC “ALFA-BANK”.</p> <p>3. Program of proper inspection of clients of JSC “ALFA-BANK”.</p> <p>4. Risk management program of financial monitoring of JSC “ALFA-BANK”.</p> <p>5. Procedure for conducting training events for bank employees, bank agents (their employees) on financial monitoring issues in JSC “ALFA-BANK”.</p> <p>6. Procedure for accompanying transfers of funds to JSC “ALFA-BANK”.</p>
3.2.	Chief AML/Compliance officer	<p>Polina Kharchenko – Director for Compliance Control and Financial Monitoring, Member of the Management Board, Member of the Management Board</p> <p>Tel.: +380 44 490 46 19</p> <p>E-mail: <a href="mailto:Polina.Kharchenko@alfabank.kiev.ua">Polina.Kharchenko@alfabank.kiev.ua</a></p> <p>Common e-mail: <a href="mailto:compliance@alfabank.kiev.ua">compliance@alfabank.kiev.ua</a>  FATCA related questions: <a href="mailto:FATCA@alfabank.kiev.ua">FATCA@alfabank.kiev.ua</a></p>
3.3.	Does your organization apply the principle «Know Your Customer»?	YES
3.4.	Criteria of customer illegally obtained funds legalization risk assessment	<ul style="list-style-type: none"> <li>- By type of client</li> <li>- Geographic risk criteria</li> <li>- By type of service (goods)</li> <li>- By service (goods) supply channel</li> </ul>
3.5.	Does JSC «ALFA-BANK» execute a function of internal audit or control which assesses efficiency of the illegally obtained funds legalization prevention policy?	YES
3.6.	Does JSC «ALFA-BANK» render services to shell banks?	NO
3.7.	Do the JSC «ALFA-BANK» employees engaged into the financial monitoring organization system participate in training events relating to illegal income legalization/terrorism financing prevention issues?	YES
3.8.	FATCA data	<p>Status: Reporting Model 1 FFI</p> <p>GIIN: TR7882.00000.LE.804</p>

Section 4. Other information.

4.1.	Legal Entity Identifier (LEI)	549300UJJWT7V7RCM192
4.2.	Financial Auditor	AUDIT FIRM "RSM UKRAINE" LIMITED LIABILITY COMPANY
4.3.	Bank's business type:	Retail Banking Corporate Banking Treasury and Capital markets
4.4.	Bank offer services to the below listed categories:	Retail (private persons, including high net worth persons (VIP clients)) Corporate (Small Businesses/Medium/Large Corporations) Financial institutions (Banks)
4.5.	The main geographic location (region) of the Bank's clients:	Ukraine
4.6.	Main countries of cooperation:	The CIS countries Poland Germany Austria Belgium Switzerland The Netherlands Great Britain China USA
4.7.	AML Policy	The Bank is guided by the Policy on Prevention of Money Laundering and Terrorist Financing (Version 3), accepted by the ABH Holding S.A. in 2019.
4.8.	Last independent audit of the Bank's AML Policy.	In June-September 2019 the National Bank of Ukraine performed special audits of our anti-money laundering system and confirmed its adequacy.
4.9.	FATCA	Status: Reporting Model 1 FFI GIIN: TR7882.00000.LE.804

AML Policies, Practices and Procedures	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>



Risk Assessment	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
14. Does the FI assess its FI customers' AML policies or practices?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and «Know Your Customer» information?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

Transaction Monitoring	Yes	No
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travellers checks, money orders, etc.?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

AML Training	Yes	No
24. Does the FI provide AML training to relevant employees that includes: - Identification and reporting of transactions that must be reported to government authorities. - Examples of different forms of money laundering involving the FI's products and services. - Internal policies to prevent money laundering.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

Additional information	Yes	No
28. Has any of your directors and major shareholders been listed either in the SDN list issued by the US Treasury Office of Foreign Assets Control, or any of the 'blacklists' issued by your local regulators?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
29. Does your Institution search your customer account database for terrorist names? If yes, please indicate what sanction lists are used,	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

- OFAC - United Nations - European Union - Other (Please list): <u>Ukrainian local lists</u>		
30. In case your country maintains a list of individuals and entities under financial measures and/or suspected of terrorist activities, does your Institution ensure for every customer that are not included in this list?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
31. Does your institution filter payments against relevant sanction lists?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
32. Do the laws / regulations in your jurisdiction limit or prohibit opening or maintenance of anonymous or numbered accounts?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
33. Does your bank allow direct use of your correspondent accounts by your customers to transact business on their behalf? i.e. Do you allow Payable-through accounts*? Please check one of the below answer. Yes - We do allow direct use of our correspondent accounts by our customers to transact business on their behalf. No - We do not allow direct use of our correspondent accounts by our customers to transact business on their behalf. The above questions are based on Recommendation 7-(e) of FATF's "The Forty Recommendations".	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>

**\* Notes:**

**The Ultimate beneficial owner** is any individual who exercises a decisive influence (control) on the activities of the client and / or the individual on whose behalf the financial transaction is conducted.

The ultimate beneficial owner is:

- for legal entities - any individual exercising a decisive influence on the activities of a legal entity (including through the control / ownership chain);
- for trusts created in accordance with the laws of the country of their foundation, - the founder, trustee, defender (if any), beneficiary (beneficiary) or a group of beneficiaries (beneficiaries), as well as any other individual who has a decisive influence on the activities of the trust (in including through the control / ownership chain);
- for other similar legal entities, a person having a status equivalent to or similar to the persons indicated for trusts.

The sign of a direct decisive influence on the activity is the direct ownership by an individual of a share in the amount of at least 25 percent of the authorized (joint-stock) capital or voting rights of a legal entity.

The signs of an indirect decisive influence on the activity are at least the possession by an individual of a share of at least 25 percent of the authorized (share) capital or voting rights of a legal entity through related individuals or legal entities, trusts or other similar legal entities, or the exercise of a decisive influence by the exercise of the right to control, possess, use or dispose of all assets or their shares, the right to receive income from the activities of a legal entity, trust or the like of legal education, the right of a decisive influence on the formation of the composition, the voting results of governing bodies, as well as the conclusion of transactions that make it possible to determine the basic conditions for the economic activity of a legal entity, or the activities of a trust or other similar legal education, make binding decisions that have a decisive influence on the activities of a legal entity, trust or other similar legal entity, regardless of formal ownership.

In this case, the ultimate beneficial owner won't be a person who has a formal right to 25 or more percent of the authorized capital or voting rights in a legal entity, but is a commercial agent, nominee owner or nominee holder, or only an intermediary regarding such a right.

**Politically Exposed Persons (PEPs)** – individuals, who are national, foreign public figures and figures performing public functions in international organizations.

**National public figures** – individuals, who perform or have performed prominent public functions in Ukraine, namely:

- President of Ukraine, Prime Minister of Ukraine, members of the Cabinet of Ministers of Ukraine and their deputies;
- Head of the permanent subsidiary body, formed by the President of Ukraine, his deputies;
- Head and Deputy Heads of the State Administration of Affairs;
- Heads of staff (secretariats) of government bodies that are not government employees whose posts are in category "A";
- Secretary and Deputy Secretaries of the National Security and Defense Council of Ukraine;
- deputies of Ukraine;
- Chairman and members of the Board of the National Bank of Ukraine, members of the Council of the National Bank of Ukraine;
- Heads and judges of the Constitutional Court of Ukraine, the Supreme Court, higher specialized courts;
- members of the High Council of Justice, members of the High Qualifications Commission of Judges of Ukraine, members of the Qualification and Disciplinary Commission of Prosecutors;

- Attorney General and his deputies;
- Chairman of the Security Service of Ukraine and his deputies;
- Director of the National Anti-Corruption Bureau of Ukraine and his deputies;
- Director of the State Bureau of Investigation and his deputies;
- Director of the Bureau of Financial Investigations and his deputies;
- Chairman and members of the National Council of Ukraine on Television and Radio Broadcasting, chairman and members of the Antimonopoly Committee of Ukraine, chairman and members of the National Agency for the Prevention of Corruption, chairman and members of the Accounts Chamber, chairman and members of the Central Election Commission, chairmen and members of other state collegial bodies;
- Extraordinary and Plenipotentiary Ambassadors;
- Chief of the General Staff - Commander-in-Chief of the Armed Forces of Ukraine, commanders of the Ground Forces of the Armed Forces of Ukraine, Air Forces of the Armed Forces of Ukraine, Naval Forces of the Armed Forces of Ukraine;
- civil officials whose posts are in category "A";
- Heads of prosecution bodies, heads of regional territorial bodies of the Security Service of Ukraine, Heads and judges of courts of appeal;
- Heads of administrative, managerial or supervisory bodies of state and treasury enterprises, business entities, whose state share in the authorized capital of which directly or indirectly exceeds 50 percent;
- members of governing bodies of political parties.

**Foreign public figures** are individuals who perform or have performed prominent public functions in foreign states, namely:

- Head of state, government, ministers (deputies);
- members of Parliament or other bodies performing the functions of the state legislature;
- Chairmen and board members of central banks or accounting chambers;
- members of the Supreme Court, the Constitutional Court or other judicial bodies whose decisions are not subject to appeal, except appeal in connection with exceptional circumstances;
- Extraordinary and plenipotentiary ambassadors, charge d'affaires and heads of the central bodies of military administration;
- Heads of administrative, managerial or supervisory bodies of state enterprises;
- members of governing bodies of political parties.

**Servants who perform public functions in international organizations** are officials of international organizations who hold or have held the position of Head (Director, Chairman of the Board or another) or Deputy leader in such organizations or perform or have performed any other managerial (prominent public) functions on high level, including in international interstate organizations, members of international parliamentary assemblies, judges and senior officials of international Udy.

**Family members** - spouse or equivalent persons, son, daughter, stepson, stepdaughter, adopted person, person under guardianship or trusteeship, son-in-law and sister-in-law and persons equated with them, father, mother, stepfather, stepmother, adoptive parents, guardians or trustees.

**Persons associated with PEPs** are individuals who meet at least one of the following criteria:

- it is known that such persons have in common with a politically significant person the beneficial ownership of a legal entity, trust or other similar legal entity or have any other close business relations with politically significant persons;
- are the ultimate beneficial owners of a legal entity, trust or other similar legal entity, of which it is known that they were de facto formed for the benefit of politically significant persons.

Questionnaire fulfilment date: August 10<sup>th</sup>, 2021.

**Director for Compliance Control  
and Financial Monitoring,  
Member of the Management Board  
JSC "ALFA-BANK"**



**Polina Kharchenko**