



"COMMERZBANK (EURASIJA)" AO

To Correspondent /
Counterparty Banks /
Counterparty

Kadashevskaya nab., 14/2
119017 Moscow
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Date 02/07/2021

On measures taken with respect to anti-money laundering, counteracting terrorism financing and financing of proliferation of mass destruction weapons (AML/CTF/FP)

Dear Sirs,

"COMMERZBANK (EURASIJA)" AO (hereinafter referred to "Bank") respectfully confirms that we strictly follow all the regulatory and the Central Bank requirements effective in Russia for the purposes of preventing money laundering and provision of finance for terrorist activities, as well as the relevant requirements and guidelines applied within the Commerzbank AG international banking Group.

Internal Rules on AML/CTF/FP measures have been developed and put in place at Bank. These Regulations are mandatory for the entire Bank.

A designated AML/CTF/FP officer has been appointed at Bank, who exercises control over the due implementation within the bank of the provisions of Federal Law No. 115-FZ dated August 07, 2001 (as subsequently amended) and the relevant requirements of the Bank of Russia as regards detecting transactions eligible for mandatory control and "unusual transactions", and reporting them to the relevant authorities (Rosfinmonitoring).

"COMMERZBANK (EURASIJA)" AO also strictly observes the Russian regulatory requirements applicable to KYC matters in respect of potential and existing customers, as well as, additionally, Commerzbank AG requirements in this area (including proper recording and retention of customer information and customer classification based on the level of perceived AML/CTF/FP risks).

At "COMMERZBANK (EURASIJA)" AO pre-scheduled and ad-hoc AML/CTF/FP and KYC training sessions are conducted on a regular basis for the staff (including all newcomers) both in the form of seminars and remote "e-learning" sessions (with an in-built testing element and retention of training records).

"COMMERZBANK (EURASIJA)" AO does not open "anonymous" accounts for its customers and does not establish correspondent and other business relations with the so-called shell banks, maintaining no physical presence in the jurisdictions where they are registered.

The degree of the bank's compliance with the AML/CTF/FP and KYC requirements and the efficiency of the procedures applied at the bank for these purposes are monitored on a regular basis by the Internal Audit Department (effectively performing the internal control functions at "COMMERZBANK (EURASIJA)" AO) and audit of the Commerzbank AG Group.

Please find enclosed the questionnaire of COMMERZBANK (EURASIJA) AO. In return, we kindly ask you to send us similar information and a questionnaire of your credit institution.

Sincerely yours,

Mr. Michael Roscher
Chairman of the Board
"COMMERZBANK (EURASIJA)" AO



**COMMERZBANK (EURASIJA) AO
QUESTIONNAIRE**

1. General Information

1.1	Full business name, Short name and A name in a foreign language	Joint Stock Company “COMMERZBANK (EURASIJA)” (“COMMERZBANK (EURASIJA)” AO) «COMMERZBANK (EURASIJA)» akzionernoje obschtschestwo («COMMERZBANK (EURASIJA)» AO)
1.2	Form of Incorporation	Joint Stock Company
1.3	Primary State Registration Number	1027739070259
1.4	Date of State Registration	December 10, 1998
1.5	Place of State Registration	Moscow
1.6	Name of Registering Authority	Central Bank of Russia (CBR)
1.7	Type, Number and Date of Issue of Banking License	<ul style="list-style-type: none"> General license for Banking Operations No. 3333 of 04.05.2016; License of Professional Participant of Securities Market for Dealing Activity No. 177-06519-010000 of 08.04.2003.
1.8	Location Address	Kadashevskaya nab. 14/2, Moscow 119017, Russia
1.9	Postal Address	Kadashevskaya nab. 14/2, Moscow 119017, Russia
1.10	Bank Identification Code	044525105
1.11	Taxpayer's Identification Number	7710295979
1.12	Federal State Statistical Supervision Codes	OKPO/ Russian National Classifier of Businesses and Organizations: 18680159, OKVED/ All-Russian Classifier of Types of Economic Activity: 65.12, OKOGU/ National Classifier of Government Entities and Administration: 1500010, OKATO/ National Classifier of Administrative Territorial Entities : 45286596000, OKFS/ All-Russia Classifier of Forms of Ownership : 23, OKOPF/ All-Russia Classifier of Forms of Incorporation : 12267
1.13	Registered and Paid Authorized Capital	RUR 2,155,600,000.00
1.14	SWIFT BIC	COBA RU MM XXX
1.15	Contact Phone and Fax Numbers	Phone: (495) 797 48 00 Fax: (495) 797 48 27
1.16	Internet Address	www.commerzbank.ru
1.17	E-mail	FIDeskMoscow@commerzbank.com

2. Structure and Market Position

2.1	Information of owners/shareholders	<p>“Commerzbank Aktiengesellschaft” (Commerzbank AG) - 100% stake.</p> <p>Commerzbank AG established in accordance with legislation of the Federal Republic of Germany, registration address Kaiserstrasse 16, D-60311 Frankfurt am Main, Germany; registration number HRB 32000 (hereinafter referred to as “Commerzbank AG”)</p>
2.2	Information of Management Bodies	<p>Management bodies of COMMERZBANK (EURASIJA) AO are:</p> <ul style="list-style-type: none"> • General Meeting of Shareholders; • Supervisory Board; • Managing Board; • Chairman of the Managing Board <p><u>Supervisory Board structure:</u> Supervisory Board member - Mr. Sven Lutz Gohlke Supervisory Board member - Mr. Axel Erik Folkesson Supervisory Board member - Mr. Gernot Kleckner Supervisory Board member - Mr. Meinolf Wagener Supervisory Board member - Mr. Holger Kautzky</p> <p><u>Management Board structure:</u> Chairman of the Board – Mr. Michael Roscher Deputy Chairman of the Board – Mr. Alexander Vladimirovich Mosyagin Management Board member – Mr. Arthur Alexeevich Gorokhovskiy</p>
2.3	Location of the Continuing Management Body	Kadashevskaya nab. 14/2, Moscow 119017, Russia
2.4	Separate Subdivisions	Saint Petersburg Representative Office of Joint Stock Company “COMMERZBANK (EURASIJA)” at the address: 199178 St. Petersburg, 3-rd line of Vasilievsky Ostrov, 62, litera A
2.5	Main Correspondent Banks	<p>The Central Bank of the Russian Federation, Moscow, Russian Federation</p> <p>Commerzbank AG, Frankfurt am Main, Germany</p> <p>JSC Halyk Bank, Almaty, Kazakhstan</p>
2.6	History, Track Record, Market Niche and Competition	<p>“COMMERZBANK (EURASIJA)” AO is a 100% subsidiary of Commerzbank AG.</p> <p>“COMMERZBANK (EURASIJA)” AO is a part of Commerzbank Group presented in more than 40 countries. The Bank was founded in December 1998 and conducts its business in the following directions:</p> <ul style="list-style-type: none"> • Settlement and cash services; • International settlements; • Currency control; • Conversion operations; • Electronic client (“Bank-Client” system); • Operations in money and foreign exchange markets; • Credits and guarantees; • Trade and project financing; <p>The Bank’s clients are:</p> <ul style="list-style-type: none"> • Largest German and other European companies; • Leading Russian companies; • Public agencies. <p>Ratings by the rating agencies: ACRA (The Analytical Credit Rating Agency) assigns AAA(RU) to COMMERZBANK (EURASIJA) AO, outlook Stable</p>

2.7	Beneficiary owners	<p>There is no beneficiary owners with stake more than 25 % in capital of the Bank:</p> <p>1. Commerzbank AG is owner of 100 % shares issued by “COMMERZBANK (EURASIJA)” AO; Commerzbank AG is a public company, Stock Exchange Listing:</p> <ul style="list-style-type: none"> - Germany (Berlin, Düsseldorf, Frankfurt, Hamburg, Hanover, Munich, Stuttgart, Xetra); - Europe (London, Switzerland); - North America (Sponsored ADR). <p>2. There are no persons with stake more than 25 % in charter capital of Commerzbank AG.</p>
2.8.	Information regarding FATCA	<p>Status PFFI</p> <p>GIIN G51Q21.00025.ME.643</p>

3. Counteracting Legalization of Proceeds from Crime (Money Laundering) and Finance of Terrorism

3.1	Regulatory Framework	Internal Control Rules of “COMMERZBANK (EURASIJA)” AO for the purpose of counteracting legalization of proceeds from crime (money laundering), terrorism financing, financing of proliferation of mass destruction weapons and programs of implementing thereof.
3.2	Responsible Employee meeting qualification requirements of the CB RF approved by the CB RF Directive No. 1486-U of 09.08.2004	Head of financial monitoring group – Mrs. Lavrushina Larisa Konstantinovna
3.3	Measures taken to identify clients, establish and identify beneficiaries	“COMMERZBANK (EURASIJA)” AO is guided by procedures stipulated by Russian laws, recommendations of the FATF, Basle Committee on Banking Supervision, Wolfsberg Principles, and internal instructions of Commerzbank Group in the sphere of counteracting of legalization of proceeds from crime (money laundering), terrorism financing and financing of proliferation of mass destruction weapons.

Mr. Michael Roscher
Chairman of the Board
“COMMERZBANK (EURASIJA)” AO

