Абсолют Банк

**To Financial Counterparties and Partners**

Dear Sir/Madam,

Herewith please find below the list of Internal Regulation on AML/CTF programs of Absolut Bank (PAO):

1) Program for organization of anti-money laundering and counter-terrorism financing system in Commercial Bank "Absolut Bank" (PAO) (version 11, by Order No.1686 dd. 14 October 2019);

2) Program for identification and examination of individuals/entities being serviced by the Bank and their representatives, for identification and verification of beneficial owners, beneficiaries in Commercial Bank "Absolut Bank" (PAO) (version 17, by Order No.689 dd. 14 October 2019);

3) Program for anti-money laundering and counter-terrorism financing risk management in Commercial Bank "Absolut Bank" (PAO) (version 10, by Order No.847 dd. 14 June 2019);

4) Program for detection of customers' transactions that are subject to mandatory control and suspicious transaction in terms of Anti-Money Laundering and Counter-Terrorism Financing activities in Commercial Bank "Absolut Bank" (PAO) (version 19, by Order No.1687 dd. 14 October 2019);

5) Program for the organization of operations related to refusal to conclude/terminate a bank account (deposit) agreement with an individual or a legal entity, or refusal to execute a customer's transaction order in Commercial Bank "Absolut Bank" (PAO) (version 8, by Order No.1238 dd. 22 October 2018);

6) Program for control measures on freezing (blocking) of funds and other client's property and auditing of the client's (legal entities and individuals) subject to the measures on freezing (blocking) of funds and other client's property in Commercial Bank "Absolut Bank" (PAO) (version 9, by Order No.1684 dd. 14 October 2019);

7) Program for the organization of decision ordering the suspension of operations with funds and other property under anti-money laundering and counter-terrorism financing system in Commercial Bank "Absolut Bank" (PAO) (version 5, by Order No.1685 dd. 14 October 2019);

8) Program for education and training of the employees of Commercial Bank "Absolut Bank" (PAO) in anti-money laundering and counter-terrorism financing (version 6, by Order No.1240 dd. 22 October 2018);

9) Program for processing of client's documents or records of absence of grounds for refusal to execute transaction or enter into a bank account agreement (deposit), requests and decisions interdepartmental commission set up under the Bank of Russia (version 2, by Order No.1235 dd. 22 October 2018).

10) Internal control rules to counter financing the proliferation of weapons of mass destruction in Commercial Bank "Absolut Bank" (PAO) (version 2, by Order №1688 dd. 14 October 2019).

Sincerely yours,

Director of Investment and Trade Department
Commercial bank «Absolut Bank» (PAO)

Sergey Mikhailov

April 10, 2020