

AML/CFTA Questionnaire

16.12.2011

Corporate (complete official) name of the Bank in English	<i>Open Joint Stock Company Belvnesheconombank</i>
Contracted name of the Bank in English	<i>Belvnesheconombank</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>December 12, 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 October 27, 2006 to perform banking operations;</i></p> <p><i>Special Permit (License) of the Ministry of Finance of the Republic of Belarus №02200/0247744 dated July 13, 2007 to perform professional and stock exchange transactions with securities;</i></p> <p><i>License of the Ministry of Finance of the Republic of Belarus No. 02200/0065061 dated June 23, 2010 to perform transactions with precious metals and stones.</i></p>
Domicile (registered office)	<i>32, Miasnikova str., 220050 Minsk, Republic of Belarus</i>
Mailing address	<i>32, Miasnikova str., 220050 Minsk, Republic of Belarus</i>
Contact telephone and fax numbers	<i>Tel. : +375 17 2186650, +375 2092944 Fax :+375 17 2264809</i>
e-mail address	<i>office@bveb.minsk.by</i>
Website address	<i>www.bveb.by</i>
BIC and country identifier code (similar unique identifier attribute)	<i>153001226</i>
S.W.I.F.T.	<i>BELB BY 2X</i>
Unique payer's reference (similar unique identification attribute)	<i>100010078</i>
Authorized share capital	<i>Belvnesheconombank's Authorized Capital is registered at Br 758 464 million as at August 31, 2011.</i>
Information on founders	<p><i>Ministry of Finance of the Republic of Belarus;</i></p> <p><i>Vnesheconombank of the USSR, Moscow (now State Corporation for Development and Foreign Economic Affairs</i></p>

	<p>(Vnesheconombank); JSC Evrofinance, Moscow; Commercial Bank Eurobank, Paris (now VTB (France)); JSC Atlant, Minsk</p>
Information on shareholders holding a stake of over 5% in the share capital	<p>State Corporation Bank for Development and Foreign Economic Affairs (Vnesheconombank) - 97.49 % Akademika Sakharova Prospekt, 9, Moscow, GSP – 6, 107996, Russian Federation</p>
Information on beneficial owners ¹	<p>State Corporation Bank for Development and Foreign Economic Affairs (Vnesheconombank) - 97.49 % Akademika Sakharova Prospekt, 9, Moscow, GSP – 6, 107996, Russian Federation</p>
Information on the Bank's governing bodies (location, structure of governing bodies, and also surnames, first names and patronymics (if applicable) of natural persons sitting on such executive body (bodies))	<p>Supervisory Board: Petr Fradkov – Chairman of the Supervisory Board, First Deputy Director, Directorate of Investment Banking Operations, Vnesheconombank, Moscow; Georgy Egorov - Deputy Chairman of the Supervisory Board; Sergey Lykov - Deputy Chairman of the Supervisory Board; Member of the Board-Deputy Chairman, Vnesheconombank, Moscow; <u>Members of the Supervisory Board:</u> Andrey Arshinov – Deputy Chairman of the Management Board, Member of the Board, Member of the Board of Directors, OJSC Natsionalny Kosmichesky Bank, Moscow; Aleksandr V. Zelenov - Director, Financial Institutions Department, Vnesheconombank, Moscow; Natalya Gubkina – Director, Planning and Economic Department, Vnesheconombank, Moscow; Aleksandr Kernozhitsky – Director, Financial Department, Minsk City Executive Committee; Nikolay Kosov – First Deputy Chairman, Vnesheconombank, Moscow;</p>

¹ A beneficial owner is a natural person (a body corporate where it is impossible to identify such person) that owns the property of a body corporate or holds an interest (shares) in the authorized share capital of a body corporate in an amount equal to or exceeding 10 per cent thereof, including same via other natural persons and/or bodies corporate, and is in a position to influence decisions to be taken by such body corporate.

	<p><i>Sergey Kuznetsov - Director of Legal Department State Corporation, Vnesheconombank, Moscow;</i></p> <p><i>Sergey Noskov - Director of Directorate of Banking Business Support State Corporation Vnesheconombank, Moscow;</i></p> <p><i>Nataliya Rannikh - Head of the Department of Business Administration of Subsidiary Banks, State Corporation, Vnesheconombank, Moscow.</i></p> <p>Management Board:</p> <p><i>Chairman of the Management Board - Pavel Kallaour.</i></p> <p><u><i>Deputy Chairmen of the Management Board:</i></u></p> <p><i>Dmitri Koulevatsky – First Deputy Chairman of the Management Board;</i></p> <p><i>Oleg Prohortchik - Deputy Chairman of the Management Board;</i></p> <p><i>Vladimir Zhourba - Deputy Chairman of the Management Board – Director of Human Resources Department;</i></p> <p><i>Andrey Romanenko - Deputy Chairman of the Management Board;</i></p> <p><i>Sergey Zelenko - Deputy Chairman of the Management Board.</i></p> <p><u><i>Members of the Board:</i></u></p> <p><i>Anatoly Minich - Member of Management Board;</i></p> <p><i>Pavel Mandryka - Member of Management Board, Director of Corporate Business Department;</i></p> <p><i>Tatyana Polyegoshko - Member of Management Board, Director of Financial and Economic Department.</i></p>
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</i>
Surname, first name and patronymic (if applicable) of the Chief Executive Officer of the Bank	<i>Kallaour Pavel Vladimirovich</i>
Surname, first name and patronymic (if applicable) of the Chief Accountant of the Bank	<i>Kushnerova Zinaida Stepanovna</i>
<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>Are founders of (participants in) the Bank holding 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Are beneficial owners politically exposed persons² in foreign countries? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please enter their surnames, first names and patronymics (where applicable)</p>	
Stand-alone units and branches of the Bank and their number	<p>See our site http://eng.bveb.by/about/branches/</p>
Representative offices of the Bank and their number	-
Subsidiaries and associated companies of the Bank and their number	<p>See our site http://eng.bveb.by/about/subsidiaries/</p>
Information on the supervisory authority of the country of the Bank's domiciliation (name, location)	<p>National Bank of the Republic of Belarus 20, Nezavisimosty Ave., 220008 Minsk, Republic of Belarus</p>
<p>Does the supervisory authority conduct inspections of the Bank's compliance with AML/CFT regulations? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please state frequency of such inspections</p>	<p>The National Bank of the Republic of Belarus reviews AML Policies and Procedures of Belvnesheconombank conducts inspections at intervals established by the legislation of the Republic of Belarus</p>
Track record, business reputation, banking specialization, information on the size of the market segment controlled and competition, reorganization, changes in activities, etc.	<p>See our site http://eng.bveb.by/about/</p>
Bank's ratings	<p>See our site http://eng.bveb.by/about/international-rating/</p>
Name of auditors (self-employed auditor)	Ernst & Young
Date of last audit	09.03.2011
<p>Is there a possibility of receiving an audit report from the Bank if need arises? <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 customer's registration? <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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Are banks in the country of the customer's registration required to comply with AML/CFT regulations? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

² Politically exposed person is a natural person who performs or has performed important public functions, members of their families or their close associates (e.g. the term 'politically exposed person' may be applied to heads of state and government, senior judges, senior party functionaries, high-ranking diplomats, senior government administration functionaries and military leaders, heads of organizations engaged in the extraction of natural resources or exercising monopolistic control over the commodity market, senior and influential representatives of religious organizations, etc.)

<p>Has the Bank appointed Compliance Officer responsible for the compliance with internal control policies and procedures designed in accordance with national AML/CFT regulations? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please state:</p>	
His/her surname, first name and patronymic (if applicable)	<i>Marina Monastyrnaya</i>
Position title	<i>Director of Risk - Management Department</i>
Telephone, fax	<i>+375 17 2092450</i>
e-mail address	<i>monastyrnaya@bveb.minsk.by</i>
<p>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</p>	
<p>Please detail remedial measures taken (types of breaches committed)</p>	
<p>Does the Bank conduct identification of parties to financial transactions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Are potential customers checked for information about their inclusion in the list of individuals and bodies corporate engaged in terrorism? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
Retention period for customer identification documents	<i>Identification documents retention period in the Bank is 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>Documents relating to the execution and/or performance of financial transactions subject to special control retention period in the Bank is five years from the date of executing such financial transactions</i>
<p>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</p>	
<p>Has the Bank adopted procedures of documenting suspicious financial transactions and reporting such information to designated financial monitoring agencies? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Does the Bank assess risks of customer-generated financial transactions for AML/CFT purposes? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Does the Bank take additional measures to exercise control over operations of 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 with a view to laundering proceeds of crime and financing terrorism in the Bank or via the Bank? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>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</p>	
<p>Does the Bank collect and analyze information on the activities of the Bank's customers? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

Does the Bank maintain accounts for anonymous holders?

Yes 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)?

Yes No

Does the Bank maintain correspondent relations with banks that have no physical presence in a country (so-called 'shell banks')?

Yes No

Does the Bank provide AML/CFT training for its staff?

Yes No

Dmitri Koulevatsky
First Deputy Chairman of the Board

