



**VTB Bank (Europe) SE**  
Rüsterstraße 7–9  
60325 Frankfurt am Main  
Postfach 10 17 32  
60017 Frankfurt am Main  
Germany

**To whom it may concern**

9.01.2018

**Compliance with anti-money-laundering legislation:  
Implementation of Anti-Money-Laundering Procedures in VTB Bank (Europe) SE**

Dear Madam, Dear Sir,

We would like to take this opportunity to inform your esteemed bank about measures and procedures implemented in VTB Bank (Europe) SE in compliance with German anti-money-laundering legislation and prescriptions, as well as give you background information on Germany's regulatory environment.

As a bank established under the laws of the Federal Republic of Germany, VTB Bank (Europe) SE is licensed, regulated and supervised by the "Bundesanstalt für Finanzdienstleistungsaufsicht", or in short "BaFin" (Federal Supervisory Office for the Financial Services Sector). This institution also monitors compliance with the German Money Laundering Act. The Money Laundering Act can be accessed on the internet at [www.bafin.de](http://www.bafin.de) in both German and English. It is among the strictest of its kind in the entire world.

According to this Act, and also according to § 154 AO (German Tax Code), German banks have to identify their customers fully, that is, records are kept stating name, address, date and place of birth (physical persons) or registration details (juridical persons) of an account holder, as well as of any person empowered to draw on an account, together with the number of the account or safe custody account. Furthermore, VTB Bank (Europe) SE requires information about the ultimate beneficial owners of its customers.



Telefon: +49 69 2168-0  
Telefax: +49 69 2168-6319  
[service@vtb.eu](mailto:service@vtb.eu)  
[www.vtb.eu](http://www.vtb.eu)

Vorsitz. d. Aufsichtsrates:  
Herbert Moos

Vorstand:  
Arthur Iliyav, Vorsitzender  
Alexander Frey  
Oxana Kozliouk  
Oleg Osipenko

USt.-IdNr.: DE 114104505  
Sitz: Frankfurt am Main  
HRB: 12169  
BIC: OWHBDEFF



VTB Bank (Europe) SE only allows the transfer of funds to the debit of existing accounts; our bank does not support cash transactions. In this context, it is to be noted that neither are accounts maintained for clients (banks/corporates/individuals) who are residents of countries included in the FATF listing of non-cooperative countries, nor does VTB Bank (Europe) SE AG itself maintain accounts with financial institutions in any of these countries. Also, no accounts are maintained for so-called shell banks, i.e. banks without a physical presence in their country of residence.

VTB Bank (Europe) SE has appointed a senior member of staff as both co-ordinator of all anti-money-laundering measures taken in the bank and supervisor of their implementation and the compliance with these measures.

Not only does VTB Bank (Europe) SE fully comply with the German Money Laundering Act, but we also carry out an electronic check of all transaction data against national and international sanctions lists (OFAC, UN, EU, SECO and HM Treasury lists).

On July 31st, 2014 the EU imposed sectorial sanctions/restrictions on Russian banks including our superordinated entity OAO VTB Bank. The financial sanctions target state-owned banks and their subsidiaries outside Russia. However, please note that the subsidiaries of state-owned Russian banks located inside the European Union are explicitly excluded from sanctions.

For general data about VTB Bank (Europe) SE (such as legal and postal address, contact details, but also shareholder information and information on the Management Board of our Bank) reference is made to our Annual Report which you will find published at [www.vtb.eu](http://www.vtb.eu)

We trust that this information rendered on a voluntary basis fully covers any needs which might arise in the context of the anti-money-laundering legislation in your country of residence. Please do not hesitate to contact us should you have further questions regarding this subject.

Yours sincerely,

VTB Bank (Europe) SE

A handwritten signature in black ink, appearing to read 'A Frey'.

A Frey

A handwritten signature in black ink, appearing to read 'S Glaab'.

S Glaab