

Regulation of the Bank of Russia dd. December 15, 2014 No. 445-P  
"Requirements to Regulations on Internal Control of Non-Bank Financial Institutions  
for the Purpose of Anti-Money Laundering and Combating the Financing of  
Terrorism"

Pursuant to [Federal Law](#) dd. August 7, 2001 No. 115-FZ "On Anti-Money Laundering and Combating the Financing of Terrorism" (Corpus of Laws of the Russian Federation, 2001, No. 33, art. 3418; 2002, No. 30, art. 3029; No. 44, art. 4296; 2004, No. 31, art. 3224; 2005, No. 47, art. 4828; 2006, No. 31, art. 3446, art. 3452; 2007, No. 16, art. 1831; No. 31, art. 3993, art. 4011; No. 49, art. 6036; 2009, No. 23, art. 2776; No. 29, art. 3600; 2010, No. 28, art. 3553; No. 30, art. 4007; No. 31, art. 4166; 2011, No. 27, art. 3873; No. 46, art. 6406; 2012, No. 30, art. 4172; No. 50, art. 6954; 2013, No. 19, art. 2329; No. 26, art. 3207; No. 44, art. 5641; No. 52, art. 6968; 2014, No. 19, art. 2311, art. 2315, art. 2335; No. 23, art. 2934; No. 30, art. 4214, art. 4219) (the Federal Law) and [Federal Law](#) dd. July 10, 2002 No. 86-FZ "On the Central Bank of the Russian Federation (Bank of Russia)" (Corpus of Laws of the Russian Federation, 2002, No. 28, art. 2790; 2003, No. 2, art. 157; No. 52, art. 5032; 2004, No. 27, art. 2711; No. 31, art. 3233; 2005, No. 25, art. 2426; No. 30, art. 3101; 2006, No. 19, art. 2061; No. 25, art. 2648; 2007, No. 1, art. 9, art. 10; No. 10, art. 1151; No. 18, art. 2117; 2008, No. 42, art. 4696, art. 4699; No. 44, art. 4982; No. 52, art. 6229, art. 6231; 2009, No. 1, art. 25; No. 29, art. 3629; No. 48, art. 5731; 2010, No. 45, art. 5756; 2011, No. 7, art. 907; No. 27, art. 3873; No. 43, art. 5973; No. 48, art. 6728; 2012, No. 50, art. 6954; No. 53, art. 7591, art. 7607; 2013, No. 11, art. 1076; No. 14, art. 1649; No. 19, art. 2329; No. 27, art. 3438, art. 3476, art. 3477; No. 30, art. 4084; No. 49, art. 6336; No. 51, art. 6695, art. 6699; No. 52, art. 6975; 2014, No. 19, art. 2311, art. 2317; No. 27, art. 3634; No. 30, art. 4219; No. 45, art. 6154), this Regulation sets forth the requirements for internal control regulations for anti-money laundering and combating the financing of terrorism (AML/CFT ICR) in non-bank financial institutions, which for the purpose of this Regulation include securities market professionals (hereinafter - traders), insurance organizations (other than health insurance organizations specialized exclusively in compulsory health insurance) (hereinafter - insurance companies), insurance brokers, investment fund, unit investment fund and non-state pension fund management companies (hereinafter - management companies), non-state pension funds, consumer credit unions, including agricultural credit unions (hereinafter - credit unions), microlenders, P&I associations, and pawn shops.

## Chapter 1. General

1.1. The requirements set by this Regulation for AML/CFT ICR shall be applied by non-bank financial institutions depending on their type as specified in [Exhibit 1](#) hereto.

1.2. The basic principles and objectives of internal control implemented by non-bank financial institutions for anti-money laundering and combating the financing of terrorism (AML/CFT) are:

protecting non-bank financial institutions from penetration of proceeds of crime;

management and mitigation of money laundering and terrorist financing risks;  
ensuring independence of a special officer in charge of compliance with

## AML/CFT ICR;

participation of a special NBFI officer responsible for AML/CFT ICR (where there is a dedicated division – of employees responsible for AML/CFT system and implementing the AML/CFT ICR), employees involved in currency or other property transactions (deals), employees providing legal support, employees performing security functions, and employees performing internal control functions, regardless of job title, acting within their competence, in identification of transactions raising suspicions of money laundering or terrorist financing.

1.3. The AML/CFT ICR are developed by a non-bank financial institution to: ensure that a non-bank financial institution fulfills the requirements established by the [laws](#) of the Russian Federation;

maintain efficiency of the AML/CFT system at a level sufficient for management of money laundering and terrorist financing risks;

prevent a non-bank financial institution, its managers and employees from being involved in money laundering and terrorist financing.

1.4. The AML/CFT ICR are developed by a non-bank financial institution in accordance with the [Federal Law](#), this Regulation and other regulations of the Bank of Russia and in consideration of the type and range of its activities, organizational structure, specifics of products (services) provided to its clients, and the level of money laundering and terrorist financing risks.

The procedures in respect of drafting, amending and agreement of the AML/CFT ICR by business units of a non-bank financial institution (if any) and approval thereof shall be detailed in the internal regulations of a non-bank financial institution.

1.5. When implementing the AML/CFT ICR, a non-bank financial institution shall:

use appropriate procedures in respect of management of money laundering and terrorist financing risks;

document data (information) related to AML/CFT;

maintain confidentiality of data concerning AML/CFT activities of a non-bank financial institution;

ensure timely submission of AML/CFT data (information) related to a relevant authority.

1.6. The AML/CFT ICR are a comprehensive document of a non-bank financial institution or a set of documents developed by a non-bank financial institution to govern its AML/CFT activities and describe the set of actions and procedures used for AML/CFT purposes as part of its internal control programs.

The procedures used to implement the AML/CFT ICR, other than those set forth herein, can be included in other internal documents of a non-bank financial institution unrelated to the AML/CFT ICR.

If the AML/CFT ICR are developed as a set of documents of a non-bank financial institution, such ICR shall contain a list of the internal documents of a non-bank financial institution included in the above set of documents.

1.7. The AML/CFT ICR include the following programs:

program for AML/CFT system organization;

program for client, client's representative, beneficiary, beneficiary owner identification (client identification program);

program for management of money laundering and terrorist financing risks

(risk management program);

program for identification of clients' transactions (deals) subject to mandatory control and transactions (deals) raising suspicions of money laundering or terrorist financing (transaction identification program);

program for freezing (blocking) of client's money or other property and procedures in respect of identification of organizations and individuals among clients who are or shall be subject to actions, such as freezing (blocking) of money and other property (program for freezing (blocking) of money and other property and auditing);

program for suspension of currency or other property transactions;

program for rejection of client's transaction orders;

program for training of AML/CFT officers of a non-bank financial institution;

program for interaction of non-bank financial institutions and identification (simplified identification) specialists, where a non-bank financial institution engages a third party for such identification (simplified identification).

The AML/CFT ICR may include other programs developed by a non-bank financial institution at its discretion.

1.8. The AML/CFT ICR shall be approved by the sole executive body of a non-bank financial institution.

The AML/CFT ICR of a non-bank financial institution consisting of one employee shall be approved by the manager of such non-bank financial institution (in case of a legal entity) or the self-employed entrepreneur (in case of a self-employed entrepreneur acting as an insurance broker).

1.9. The functions of control of AML/CFT activities of a non-bank financial institution can be vested, at the discretion of a non-bank financial institution and in accordance with its internal regulations, in a person acting as its sole executive body, or his/her deputy, or a member of its executive body (manager of a non-bank financial institution); and if a non-bank financial institution is a self-employed entrepreneur, such functions shall be performed by the self-employed entrepreneur or his/her designated employee (if the self-employed entrepreneur has employees).

1.10. A non-bank financial institution shall ensure compliance of the non-bank financial institution and its employees with the AML/CFT programs.

The manager of the non-bank financial institution shall control compliance of the AML/CFT ICR with the anti-money laundering and counter terrorist financing [laws](#) of the Russian Federation.

The AML/CFT ICR of the non-bank financial institution shall be brought in conformity with the anti-money laundering and counter terrorist financing laws of the Russian Federation within three months from the date of enactment of the federal law amending the [Federal Law](#), unless otherwise expressly stated in the respective federal law.

The AML/CFT ICR of non-bank financial institutions shall be brought in conformity with the AML/CFT regulation within three months of its coming into effect, unless otherwise expressly stated in the respective regulation.

1.11. The requirements of this Regulation do not apply to traders acting as credit institutions, except as expressly stated herein.

## **Chapter 2. Management of AML/CFT system in non-bank financial institutions and program of AML/CFT system management**

2.1. The non-bank financial institution shall appoint one of its employees as a special officer responsible for implementing the AML/CFT ICR (responsible officer).

The functions of a responsible officer in a non-bank financial institution as listed in [clause 1](#) of exhibit 1 hereto can be performed by the manager (and if an insurance broker is a self-employed entrepreneur, such functions can be performed by the self-employed entrepreneur or his/her designee).

2.2. The responsible officer reports directly to the manager of a non-bank financial institution.

The responsible officer of a non-bank financial institution should meet the qualification requirements set forth in [Instruction](#) of the Bank of Russia dd. December 5, 2014 No. 3470-U "Qualification requirements for special officers responsible for implementation of internal control regulations for the purpose of Anti-Money Laundering and Combating the Financing of Terrorism in non-bank financial institutions"\* (Instruction of the Bank of Russia No. 3470-U).

2.3. During any period of temporary disability, leave (including pregnancy leave and maternity leave), business trip of the responsible officer of the non-bank financial institution as listed in [clause 1](#) of exhibit 1 hereto, another employee of the non-bank financial institution meeting the qualification requirements set by [Instruction](#) of the Bank of Russia No. 3470-U for employees of AML/CFT department of the non-bank financial institution or another division of the non-bank financial institution whose competence includes AML/CFT shall be designated as the acting responsible officer.

The requirement set forth in [paragraph one](#) of this clause does not apply, if a non-bank financial institution does not engage other parties to carry on its business (does not have any employees other than the manager or the self-employed entrepreneur carrying on business on his/her own), provided that the manager of such non-bank financial institution (self-employed entrepreneur) acts as its responsible officer.

During any period of temporary disability, leave (excluding pregnancy leave and maternity leave), business trip of the responsible officer of the non-bank financial institution as listed in [clause 2](#) of exhibit 1 hereto, another employee of a non-bank financial institution meeting the qualification requirements set by [Instruction](#) of the Bank of Russia No. 3470-U for employees of AML/CFT department of the non-bank financial institution shall be designated as the acting responsible officer.

During pregnancy leave or maternity leave of the responsible officer of the non-bank financial institution as listed in [clause 2](#) of exhibit 1 hereto, his/her duties shall be performed by another employee of such non-bank financial institution meeting the qualification requirements for responsible officers set by the Bank of Russia.

2.4. The responsible officer of a non-bank financial institution as listed in [clause 2](#) of exhibit 1 hereto, and employees of AML/CFT department may combine their respective duties with other functions in the non-bank financial institution, except for controller or internal control (internal audit) service functions provided that they are not entitled to make currency or other property transactions (deals) on behalf of the non-bank financial institution, sign payment (settlement), accounting and other documents related to creation and performance of rights and obligations

of the non-bank financial institution.

The requirements of this clause prohibiting currency or other property transactions (deals), signing of payment (settlement), accounting and other documents that create or are made to perform any rights and obligations of the non-bank financial institution by the responsible officer or employees of AML/CFT department, shall not apply to non-bank financial institutions being traders having five or less employees on the payroll.

2.5. The responsible officer of the non-bank financial institution as listed in [clause 1](#) of exhibit 1 hereto is entitled to combine his/her respective duties with the functions of a responsible officer in other non-bank financial institutions referred to in [clause 1](#) of exhibit 1 hereto.

2.6. The non-bank financial institution shall inform in writing the respective territorial agency of the Bank of Russia, in charge of control and supervision of AML/CFT activities of non-bank financial institutions, of appointing its responsible officer and designating (assigning) another employee as the acting responsible officer during the pregnancy leave or maternity leave within three working days of designation (assignment) of such employees, indicating their last name, first name, patronymic (if any), position and contact details (email address (if any) and office telephone number).

2.7. Non-bank financial institutions listed in [clause 2](#) of exhibit 1 hereto shall set up an AML/CFT department or assign respective functions to an existing division<sup>6</sup> which competence includes AML/CFT (AML/CFT department) to implement the AML/CFT ICR.

A non-bank financial institution as listed in [clause 1](#) of exhibit 1 hereto, subject to its organizational structure, staff size, availability or absence of standalone subdivisions (branches), customer base and degree (level) or risks associated with its customers and their transactions, is entitled to set up an AML/CFT department.

The AML/CFT department (if it is set up) will be headed by the responsible officer.

The AML/CFT shall consist of minimum two employees of the non-bank financial institution.

2.8. The program of AML/CFT system management shall include:

provisions on the status, duties and authorities of the responsible officer, duties and authorities of employees of the AML/CFT department;

procedures in respect of interaction of the responsible officer, employees of the AML/CFT department and other employees of the non-bank financial institution (if any);

procedures in respect of interaction of the non-bank financial institution and its standalone subdivisions (branches) (if any);

procedures in respect of documentation of information (data) obtained by the non-bank financial institution when implementing the AML/CFT ICR;

procedures in respect of storage of information (documents) obtained by the non-bank financial institution as a result of AML/CFT ICR implementation;

procedures in respect of interaction with clients, including those using remote service technologies (if the non-bank financial institution offers remote services to its clients);

other provisions as may be required at the discretion of the non-bank

financial institution.

In addition to the provisions set forth in [paragraphs two through seven](#) of this clause, non-bank financial institutions listed in [clause 2](#) of exhibit 1 hereto shall include the following provisions in its program of AML/CFT system management:

description of the general AML/CFT system structure, including its elements (levels) such as the AML/CFT department (status (reporting structure), structure, tasks, functions, workflow processes);

procedures in respect of reporting any violations of the AML/CFT [laws](#) of the Russian Federation committed by other employees of the non-bank financial institution that come to the notice of other employees to the manager of the non-bank financial institution and the internal control officer of the non-bank financial institution;

procedures in respect of review of the internal system of control of compliance of the non-bank financial institution and its employees with the AML/CFT [laws](#) of the Russian Federation and the AML/CFT ICR;

list of special electronic technologies, special software (software tools, products) used by the non-bank financial institution to implement internal controls for AML/CFT (if available), including details of their developers.

2.9. The procedures in respect of review of the internal system of control of compliance of the non-bank financial institution and its employees with the AML/CFT [laws](#) of the Russian Federation and the AML/CFT ICR shall include:

procedures and periodicity (at least once a year) of internal audits to review the implementation of the AML/CFT ICR and fulfillment of the requirements established by the AML/CFT [laws](#) of the Russian Federation;

provision on submission of written reports on violations of the AML/CFT [laws](#) of the Russian Federation and the AML/CFT ICR revealed during audits, and actions based on audit findings, to the manager of the non-bank financial institution.

2.10. The program of AML/CFT system management shall assign the following functions to the responsible officer:

arrangement for drafting and submission of the AML/CFT ICR for approval to the person acting as the sole executive body of the non-bank financial institution;

making decisions during internal control for the purposes of AML/CFT, in particular, in case of doubts regarding proper qualification of any transaction as a transaction subject to mandatory control, or qualification of a client's transaction as a transaction raising suspicions of money laundering or terrorist financing, or regarding actions of the non-bank financial institution in respect of a client's transaction raising suspicions of money laundering or terrorist financing, or a client making such transaction (the above functions can be performed by employees of the AML/CFT department if respective authorities are assigned to them in accordance with internal documents of the non-bank financial institution);

arrangement of submission and control over submission of data to the competent authority;

submission of current reports to the manager of the non-bank financial institution in accordance with the timelines and procedures specified in the internal documents of the non-bank financial institution (except where the functions of the responsible officer are performed by the manager of the non-bank financial institution), drafting and submission, at least once a year, of a written report on AML/CFT ICR implementation and recommendations regarding AML/CFT system

optimization, agreed with the manager of the non-bank financial institution, to the executive body of the non-bank financial institution (if any);

other functions provided for in the internal documents of the non-bank financial institution.

2.11. For the responsible officer to perform assigned functions, the program of AML/CFT system management shall grant him/her the following rights and obligations:

right to give instructions regarding a transaction (deal), including its suspension until obtaining additional information or verifying the available information on the client or the transaction (deal);

right to request and obtain necessary documents from directors and employees of divisions of the non-bank financial institution (if any), including administrative orders, instructions and accounting documents (documents relating to transactions (deals));

right to make copies of obtained documents or electronic files;

right of access to the offices of divisions of the non-bank financial institution, and its premises used for storage of documents (archives), computer based processing of data (computer rooms) and data storage on electronic media;

obligation to ensure integrity and return of documents obtained from managers and employee of respective divisions;

obligation to ensure confidentiality of information obtained in the performance of his/her functions;

other rights and obligations assigned by the internal documents of the non-bank financial institution.

2.12. Officers of standalone subdivisions of the non-bank financial institution may, by the decision of the manager of the non-bank financial institution, perform the functions referred to in [paragraphs three and four of clause 2.10](#) hereof, and have, partially or in full, the rights and obligations of a responsible officer set forth in [clause 2.11](#) hereof (authorized AML/CFT employees).

In this case, the program of AML/CFT system management shall include provisions assigning AML/CFT rights and obligations of the responsible officer to authorized AML/CFT employees, allocating responsibilities and procedures in respect of interaction of the authorized AML/CFT employees and the responsible officer.

The activities of authorized AML/CFT employees will be coordinated by the responsible officer.

2.13. The responsible officer, authorized AML/CFT employees (if any), employees of the AML/CFT department (if available) shall, within their competence, render assistance in any AML/CFT issues to representatives of the Bank of Russia in conducting audits of the non-bank financial institution (its standalone subdivision).

### **Chapter 3. Identification Program**

3.1. The non-bank financial institution should develop an identification program in line with the requirements for identification of clients and their representatives, beneficiaries and beneficiary owners as per [Regulation](#) of the Bank of Russia dd. December 12, 2014 No. 444-P "Identification of clients, client's representatives, beneficiaries and beneficiary owners by non-bank financial

institutions for the purpose of Anti-Money Laundering and Combating the Financing of Terrorism" ([Regulation](#) of the Bank of Russia No. 444-P)\*\*

The non-bank financial institution can develop own identification programs for each category of persons: client, client's representative, beneficiary, beneficiary owner.

3.2. The identification program shall include:

procedures in respect of identification of a client, client's representative (including a representative acting as a client's sole executive body), beneficiary, beneficiary owner, including any simplified identification procedures;

procedures in respect of screening of clients, client's representatives, beneficiaries and beneficiary owners for availability or absence of data specified in [clause 2 of article 6](#) and [clause 2 of article 7.4](#) of the Federal Law;

provision on the mandatory use of lawfully accessible information sources (including such sources) as part of the identification procedures used by the non-bank financial institution, including the use of data obtained from public authorities;

provisions on actions to be taken by the non-bank financial institution to identify entities referred to in [article 7.3](#) of the Federal Law among its current or prospective clients being individuals;

list of actions (procedures) aimed at revealing and identifying of beneficiary owners of clients by the non-bank financial institution;

grounds for recognition of an individual as the beneficiary owner of a client (always with the use of the qualifying indicators contained in the definition of the term "beneficiary owner" provided in the [Federal Law](#), such as direct or indirect (through third parties) ownership (possession of a controlling interest in excess of 25 percent) of a corporate client, or the ability to control client's activities);

grounds for recognition of a person acting as the sole executive body of a corporate client or foreign non-corporate entity as its beneficiary owner (where it is impossible to track another beneficiary owner);

provisions on the methods and forms of recording data (information) obtained by the non-bank financial institution as a result of identifying clients, client's representatives, beneficiaries and beneficiary owners;

specific procedures in respect of beneficiary identification if it was not identified by the non-bank financial institution before client registration as the client provided information on the absence of a beneficiary of the planned money or other property transactions (deals) at the time of such registration;

procedures in respect of verification of information on a client, client's representative, beneficiary and beneficiary owner by the non-bank financial institution;

procedures in respect of updating the data (information) obtained by the non-bank financial institution as a result of identifying clients, client's representatives, beneficiaries and beneficiary owners, including the periodicity of such updating;

methods of interaction of the non-bank financial institution with the client when requesting data and documents necessary for identification (updating the identification data), and specifics of interaction with a client using remote service technologies (if the non-bank financial institution offers remote services to its clients);

provisions on actions to be taken by the non-bank financial institution to obtain client's information provided for in [sub-clause 1.1](#), [clause 1](#), of [article 7](#) of the

Federal Law;

procedures in respect of interaction of the non-bank financial institution and third parties obtaining data and documents necessary for identification of entities considered by the non-bank financial institution as prospective clients (if the non-bank financial institution engages third parties to obtain data and documents for identification purposes);

procedures in respect of accessing information obtained as a result of identification by employees of the non-bank financial institution (except for non-bank financial institutions that do not engage third parties to carry on its business (not having employees other than the director or the self-employed entrepreneur carrying on business on his/her own), provided that the manager of the non-bank financial institution (self-employed entrepreneur) performs the functions of the responsible officer;

procedures in respect of assessing the level (degree) of risk of client's transactions being made for the purpose of money laundering and terrorist financing, and the grounds for assessing of such risk;

other provisions as deemed necessary by the non-bank financial institution.

3.3. The non-bank financial institution shall, subject to the Federal Law and [Regulation](#) of the Bank of Russia No. 444-P, decide whether an individual can be recognized as the beneficiary owner provided that the individual, directly or indirectly (through third parties, in particular, through a legal entity, or several legal entities, or a group of legal entities), owns (possesses a controlling interest in excess of 25 percent) a corporate client, or the individual is able to control client's activities, due, among others, to the fact that he/she is entitled (positioned), in particular, through an agreement with the client, to use his/her authorities to influence the client's income or decisions to carry out specific operations (including those associated with credit risk (granting loans (credits), providing guarantees, etc.) and financial transactions.

The non-bank financial institution may identify other factors enabling an individual to control client's activities, whereby such individual will be recognized by the non-bank financial institution as the beneficiary owner of the client.

3.4. The recognition of an individual as a beneficiary owner shall be based on the analysis of a set of documents and/or other information available to the non-bank financial institution on the client and the individual.

3.5. If the actions intended to identify beneficiary owners in accordance with the [Federal Law](#) and the AML/CFT ICR fail to reveal the beneficiary owner of a corporate client or a foreign non-corporate entity, and the person acting as the sole executive body of such client is recognized as its beneficiary owner, the decision of the non-bank financial institution to recognize the person acting as a client's sole executive body as its beneficiary owner shall include all circumstances preventing the identification of a beneficiary owner, and the client's questionnaire (file) shall contain a note pointing out that the person acting as the client's sole executive body is recognized as its beneficiary owner due to the inability of the non-bank financial institution to identify the beneficiary owner.

3.6. The results of the actions taken by the non-bank financial institution to identify the beneficiary owner of a client being an individual, and in case of identification thereof, also the decision of the non-bank financial institution to recognize the individual as the beneficiary owner of such client being an individual,

together with the grounds for making this decision, shall be included in the client's questionnaire (file).

## **Chapter 4. Risk Management Program**

4.1. The non-bank financial institution, in implementing internal control for AML/CFT purposes, shall develop the risk management program.

For the purposes of this Regulation, management of money laundering and terrorist financing risks shall be deemed to include a set of actions taken by the non-bank financial institution to assess and minimize such risk through the steps prescribed by the laws of the Russian Federation, the AML/CFT ICR, and client's agreement, in particular, through requesting and analyzing additional documents, including comparison of the information contained therein with the information available to the non-bank financial institution, or refusing to execute a client's transaction order.

When implementing the risk management program, the non-bank financial institution shall arrange for classification of clients based on the risk criteria used to assess the level (degree) of risk of a client's transaction being made for money laundering and terrorist financing purposes (client risk), as well as for assessment of risk of involvement of the non-bank financial institution and its employees in money laundering and terrorist financing through the use of the non-bank financial institution's services (risk of involvement in money laundering and terrorist financing).

4.2. Risks shall be assessed for all clients except for the cases stated in the [Federal Law](#), where identification of a client, client representative, beneficiary and beneficiary owner is not required. The degree (level) of client risk is assessed according to the risk scale which may not consist of less than two degrees (levels).

The client risk assessment shall be based on a certain risk category or a set of the following risk categories:

- risk associated with a certain type of client and/or beneficiary owner;
- country risk;
- risk associated with a certain type of client's transactions.

The factors affecting the assessment of client risk in each of the above risk categories shall be determined by the non-bank financial institution in the risk management program in accordance with [exhibit 2](#) hereto.

The non-bank financial institution shall assign, at its discretion, a certain degree (level) of client risk to a client in accordance with the risk management program and in view of the factors affecting the assessment of client risk as stated in [exhibit 2](#) hereto. The non-bank financial institution should record the results of assessing the degree (level) of client risk as provided for in the risk management program and detail the grounds for referring a client to a specific degree (level) of client risk (or not referring a client to a higher risk category if the status (and/or activities) of a client conform to one or more factors provided for in [exhibit 2](#) hereto).

4.3. The non-bank financial institution shall assess the risk of being involved in money laundering and terrorist financing based on the types of products (services) provided to clients (e.g. transactions with cash or securities including bills of exchange), and subject to other factors determined by the non-bank financial institution at its sole discretion.

4.4. The risk management program shall include:

implementing the money laundering and terrorist financing risks management system, depending on the results of assessment of the client risk and risk of involvement in money laundering and terrorist financing;

methodology for revealing and assessing the risk of money laundering and terrorist financing in respect of client risk and in respect of risk of involvement in money laundering and terrorist financing;

procedures in respect of assignment, procedures and timelines for revision of the degree (level) of client risk and risk of involvement in money laundering and terrorist financing;

procedures in respect of recording and documenting of the results of assessing the degree (level) of client risk and risk of involvement in money laundering and terrorist financing;

procedures in respect of monitoring, analyzing and control of client risk and risk of involvement in money laundering and terrorist financing in connection with provision of certain products (services) or making transactions (deals) on account of clients, indicating the periodicity of related activities;

methods of management of money laundering and terrorist financing risks, in particular, drafting a list of preventive actions aimed at mitigation of such risks;

specifics of monitoring and analysis of clients' transactions referred to different degrees (levels) of risk;

other provisions as deemed necessary by the non-bank financial institution.

## **Chapter 5. Transaction Identification Program**

5.1. The transaction identification program shall set forth the procedures applicable to transactions which are subject to mandatory control according to the [Federal Law](#), and transactions raising suspicions of money laundering or terrorist financing by the non-bank financial institution during AML/CFT ICR implementation.

5.2. The transaction identification program shall include:

list of indicators of a suspicious transaction as listed in [exhibit 3](#) hereto used to identify transactions raising suspicions of money laundering or terrorist financing, subject to the field and scale of activity of the non-bank financial institution, its organizational structure, specifics of products (services) offered to clients, and the level of money laundering and terrorist financing risks. The non-bank financial institution may, at its discretion, add other suspicious transaction indicators;

mechanism of interaction of the employees of the non-bank financial institution identifying transactions subject to mandatory control and suspicious transactions and the responsible officer of the non-bank financial institution (employees of its AML/CFT department) (except for non-bank financial institutions that do not engage third parties to carry on its business (do not have employees other than the director or the self-employed entrepreneur carrying on business on his/her own), provided that the manager of the non-bank financial institution (self-employed entrepreneur) performs the functions of the responsible officer);

provisions in respect of the officer (officers) of the non-bank financial institution responsible for qualifying of an unusual transaction to the category of suspicious transactions, qualifying a transaction as subject to mandatory control, or submitting data to a competent authority;

provisions on the timelines of making decisions to qualify (not to qualify) a client's transaction as suspicious, and decision documentation procedures;

procedures (including methods) for documenting data on transactions subject to mandatory control and transactions raising suspicions of money laundering or terrorist financing which allow reinstating transaction details (including the transaction amount and currency and the client's counterparty), and the procedures in respect of submission of data on such transactions to a competent authority;

procedures in respect of reporting (where necessary) identified transactions subject to mandatory control or suspicious transactions to the manager of the non-bank financial institution;

provisions on actions to be taken by the non-bank financial institution in line with its risk management program with regard to clients involved in suspicious transactions;

specifics of identification of transactions subject to mandatory control and suspicious transactions (deals) made (effected) using modern technologies for remote making (effecting) of transactions (if the non-bank financial institution offers remote services to its clients);

other provisions as deemed necessary by the non-bank financial institution.

5.3. In addition to the provisions set forth in [clause 5.2](#) hereof, non-bank financial institutions listed in [clause 2](#) of exhibit 1 hereto shall include the following provisions in their transaction identification programs:

allocation of responsibilities for identification and reporting of transactions subject to mandatory control and suspicious transactions among the divisions (employees of the divisions) of the non-bank financial institution;

procedures in respect of drafting and submission of transaction notices to the responsible officer (authorized AML/CFT employee) by the employees responsible for identification of transactions subject to mandatory control and unusual transactions (deals) raising suspicions of money laundering or terrorist financing;

procedures in respect of qualifying a transaction as meeting the criteria for mandatory control or having any indicators of an unusual transaction provided for in the AML/CFT ICR by the employees of the non-bank financial institution responsible for identifying such transactions (before or during their making, or in case of their refusal, including the procedures in respect of requesting additional information and documents from a client with regard to such transactions);

procedures used by the non-bank financial institution for extensive verification of documents and information concerning clients, their transactions and activities, representatives, and/or beneficiaries or beneficiary owners (including those obtained at the request of the non-bank financial institution) to justify or deny suspicions of money laundering or terrorist financing arising in respect of a client's transaction, in particular, procedures in respect of specifying the nature of a transaction based on the client's objectives, legitimacy and economic purpose of a transaction.

5.4. In case of doubts about justified qualification of a transaction as subject to mandatory control, or identification of a transaction raising suspicions of money laundering or terrorist financing, the employee of the non-bank financial institution as listed in [clause 2](#) of exhibit 1 hereto having identified such transaction shall draft a transaction notice and submit it to the responsible officer (another employee of a AML/CFT department authorized in accordance with the AML/CFT ICR or other internal documents of the non-bank financial institution, in particular, his/her job description, to receive such notice, an authorized AML/CFT employee).

The form of a transaction notice, method and timeline for its drafting and submission to the responsible officers (another employee of AML/CFT department, authorized AML/CFT employee), and the procedures and timelines for keeping same shall be determined by the non-bank financial institution at its discretion.

A transaction notice shall specify:

- 1) transaction type:  
transaction raising doubts about its justified qualification as subject to mandatory control;  
transaction raising suspicions of money laundering or terrorist financing;
- 2) transaction subject;
- 3) transaction date, amount and currency;
- 4) details of a person (persons) involved (transaction parties);
- 5) troubles with qualifying a transaction as subject to mandatory control, or reasons for which a transaction is qualified as raising suspicions of money laundering or terrorist financing;
- 6) details of the employee of the non-bank financial institution who drafted the notice and his/her signature (handwritten, electronic or similar as determined by the non-bank financial institution);
- 7) date and time of drafting a transaction notice;
- 8) date of transaction notice receipt by the responsible officer (another employee of AML/CFT department, authorized AML/CFT employee) and his/her signature (handwritten, electronic or similar as determined by the non-bank financial institution);
- 9) record of the decision of the responsible officer (another employee of AML/CFT department if duly authorized, authorized AML/CFT employee), regarding the transaction notice, date of decision and his/her signature (handwritten, electronic or similar as determined by the non-bank financial institution). If the responsible officer (another employee of AML/CFT department, authorized AML/CFT employee) decides not to submit the transaction data to a respective authority, the transaction notice shall also include a proper justification of his/her decision;
- 10) record of the decision of the manager of the non-bank financial institution regarding the transaction notice, if the final decision (refusal) to submit the transaction data to a respective authority in line with the internal documents of the non-bank financial institution is within his/her competence by the AML/CFT ICR, and his/her signature (handwritten, electronic or similar as determined by the non-bank financial institution).

One notice may contain information on several transactions.

5.5. The non-bank financial institution shall decide to qualify (not to qualify) a client's unusual transaction as suspicious at its discretion based on the available information and documents relating to the client and/or its activities (transactions), the client's representative and/or beneficiary or beneficiary owner (if any).

## **Chapter 6. Money and Other Property Freezing (Blocking) and Transaction Verification Program**

6.1. The program for freezing (blocking) money and other property and transaction verification shall include:

procedures of obtaining information published on the official website of a

competent authority in Internet (website);

procedures in respect of money and property freezing (blocking);

procedures of documenting information on any cases of freezing (blocking) of client's money or other property (including client's details; grounds for money or property freezing (blocking); date and time of money or property freezing (blocking); type of client's property subject to freezing (blocking), identifiers of a client's property);

procedures and periodicity of identification of clients who are or shall be subject to freezing (blocking) of money or other property (verification), and methods of documentation of verification results;

procedures of recording and documentation of information on any money disbursed to individuals included in the list of organizations and individuals known to be involved in extremist or terrorist activities (List of organizations and individuals);

procedures of client notification of money or other property transaction denial due to availability of evidence of client's involvement in extremist or terrorist activities obtained in accordance with [clause 2 of article 6](#) and [clause 2 of article 7.4](#) of the Federal Law;

procedures of competent authority notification of freezing (blocking) of client's money or other property, and reporting of verification results;

other provisions as deemed necessary by the non-bank financial institution.

6.2. In addition to the provisions set forth in [clause 6.1](#) hereof, non-bank financial institutions referred to in [clause 2](#) of exhibit 1 hereto, shall include the following provisions in their program for freezing (blocking) money and other property and verification:

persons authorized to access and receive information from a competent authority, indicating the procedure and periodicity, including the date and time, of receipt thereof;

persons authorized by the non-bank financial institution to freeze (block) money and other property, and persons authorized to perform verifications;

persons authorized to identify organizations and individuals among its clients, whose money or other property is subject to freezing (blocking) based on the information of a competent authority, and procedures in respect of interaction of such persons and persons authorized by the non-bank financial institution to take such measures;

reporting of verifications performed by the non-bank financial institution, including its branches, and measures taken, such as freezing (blocking) clients' money or property to the manager of the non-bank financial institution.

6.3. The AML/CFT ICR of the non-bank financial institution shall include procedures in respect of termination of client's money or other property freezing (blocking) if it becomes known to the non-bank financial institution that the client is excluded from the List of organizations and individuals, or termination of the decision to freeze (block) money or other property of such client made earlier by an interdepartmental coordination authority involved in prevention of terrorist financing.

## **Chapter 7. Transaction Order Rejection Program**

7.1. The transaction order rejection program shall include:

list of grounds for rejection of a client's transaction order set by the non-bank

financial institution in accordance with the AML/CFT laws of the Russian Federation;

factors taken into account when making a decision to reject a transaction order determined in accordance with the risk management program and the transaction identification program, and subject to the field of activity of the non-bank financial institution.

other provisions as deemed necessary by the non-bank financial institution.

7.2. In addition to the provisions set forth in clause 7.1 hereof, non-bank financial institutions listed in clause 2 of exhibit 1 hereto shall include the following provisions in their transaction order rejection programs:

persons authorized in accordance with the Federal Law to make decisions to reject client's transaction orders, and procedures in respect of accepting and executing such decisions by the non-bank financial institution;

procedures in respect of informing a client of a decision to reject their transaction order made by the non-bank financial institution in accordance with the Federal Law;

procedures in respect of recording and maintaining information on the cases of rejection of clients' transaction orders in accordance with the Federal Law and the grounds for same.

7.3. The AML/CFT ICR of the non-bank financial institution shall include procedures in respect of taking actions with regard to a client in case of rejection of a client's transaction order.

## **Chapter 8. Program for interaction of non-bank financial institutions and identification (simplified identification) specialists**

8.1. If the non-bank financial institution, acting in accordance with the Federal Law, engages a credit institution on a contractual basis for identification or simplified identification of clients, their representatives, beneficiaries, or beneficiary owners, the non-bank financial institution shall develop a program setting forth the procedures in respect of interaction with credit institutions engaged for identification (simplified identification) purposes.

8.2. The program for interaction of the non-bank financial institution and credit institutions engaged in identification (simplified identification) shall include:

procedures in respect of making agreements between the non-bank financial institution and credit institutions engaged for identification (simplified identification), and a list of officers of the non-bank financial institution authorized to make such agreements;

procedures in respect of identification or simplified identification of clients being individuals, their representatives, beneficiaries, or beneficiary owners in accordance with the agreements made between the non-bank financial institution and credit institutions engaged for identification (simplified identification);

procedures in respect of delivery of data to the non-bank financial institution obtained as a result of identification (simplified identification) of clients by credit institutions engaged for identification purposes;

procedures used by the non-bank financial institution to monitor compliance of credit institutions engaged in identification (simplified identification) with the requirements for identification (simplified identification), including the procedures, timelines and scope of data provision to the non-bank financial institution, and

actions taken by the non-bank financial institution to remedy any revealed violations;

grounds, procedures and timelines for making a decision by the non-bank financial institution to unilaterally repudiate agreements with credit institutions engaged in identification (simplified identification), if they fail to comply with the requirements for identification (simplified identification), and a list of officers of the non-bank financial institution authorized to make such decisions;

provisions on liability of credit institutions engaged by the non-bank financial institution for identification (simplified identification) for failure to comply with the requirements for identification (simplified identification), including the procedures, timelines and scope of data provision to the non-bank financial institution;

procedures in respect of recording and documentation of data (information) to be submitted to the Bank of Russia by the non-bank financial institution;

provisions on officers of the non-bank financial institution authorized to submit information to the Bank of Russia;

other provisions as deemed necessary by the non-bank financial institution.

### **Chapter 9. Final Provisions**

9.1. This Regulation shall become effective within 10 days of its [official publishing](#) in the "Bulletin of the Bank of Russia".

9.2. The AML/CFT system and the AML/CFT ICR used by the non-bank financial institution as of the effective date of this Regulation shall be brought in conformity with this Regulation within three months of its coming into effect.

Chairman of Central Bank  
of the Russian Federation

E.S. Nabiullina

Agreed by

Director  
Federal Finance Monitoring Service

Yu.A. Chikhanchin

\* Registered by the Ministry of Justice of the Russian Federation on December 24, 2014 No. 35349.

\*\* Registered by the Ministry of Justice of the Russian Federation on January 20, 2015 No. 35594.

Registered by the RF Ministry of Justice on February 9, 2015.

**Exhibit 1**  
to [Regulation](#) of the Bank of Russia dd.  
December 15, 2014 No. 445-P  
"Requirements to Regulations on  
Internal Control of Non-Bank Financial  
Institutions for the Purpose of Anti-  
Money Laundering and Combating the  
Financing of Terrorism"

**Types of non-bank financial institutions**

1. Non-bank financial institutions which meet the criteria for classification as small-size companies and micro-companies according to their average staff and operating income determined in accordance with the laws of the Russian Federation, including:

- management companies;
- non-government pension funds;
- credit unions;
- microlenders;
- insurance brokers;
- P&I associations;
- pawn shops.

2. Non-bank financial institutions, listed in [clause 1](#) of this Exhibit, which do not meet the criteria set by the laws of the Russian Federation for classification as small-size companies and micro-companies, as well as the following non-bank financial institutions:

- traders;
- insurance companies.

3. If conditions arise during the normal operations of the non-bank financial institution as listed in [clause 1](#) of this Exhibit, which prevent its classification as a small-size company and micro-company, such non-bank financial institution will be subject to the requirements established by this Regulation for non-bank financial institutions listed in [clause 2](#) of this Exhibit.

**Exhibit 2**  
to [Regulation](#) of the Bank of Russia dd.  
December 15, 2014 No. 445-P  
**"Requirements to Regulations on  
Internal Control of Non-Bank Financial  
Institutions for the Purpose of Anti-  
Money Laundering and Combating the  
Financing of Terrorism"**

**Factors affecting assessment of client risks**

1. Factors affecting the assessment of client risk in the category "risk associated with a certain type of client and/or beneficiary owner" are as follows:

client and/or the beneficiary owner has a status indicated in [article 7.3](#) of the Federal Law;

there are grounds to believe that documents and information submitted by a client, in particular, for identification purposes, are inaccurate;

decision was made earlier to reject a client's transaction order;

there is no publicly available information on the business of a corporate client, foreign non-corporate entity;

legal address of a legal entity is indicated by the Federal Tax Service as an address used by other legal entities (for obtaining such information, the non-bank financial institution shall use the resource "Shared Business Addresses (addresses provided for state registration by several legal entities)" provided on the [official website](#) of the Federal Tax Service);

corporate client, foreign non-corporate entity is known to have declared zero accounting (financial) results over the last four reporting periods, if the non-bank financial institution knows about currency or property transactions (deals) of a corporate client, foreign non-corporate entity;

client and/or a client's beneficiary owner is included in the List of organizations and individuals;

decision to freeze (block) money or other property of a client was made earlier by an interdepartmental coordination authority involved in prevention of terrorist financing;

corporate client does not have a body or representative at the registered address indicated in the unified state register of legal entities;

other factors determined at the discretion of the non-bank financial institution.

2. A factor affecting the assessment of the client risk in the category "country risk" is the availability to the non-bank financial institution of information regarding a foreign state (territory), where a client is registered (incorporated), stays or resides, or where a client's beneficiary owner is registered (resides), or a client's counterparty is registered (stays or resides), or a client's banks is registered (located), which evidences that:

foreign state (territory) is subject to international sanctions ratified by the Russian Federation (e.g. sanctions imposed by the Russian Federation following the resolutions of the United Nations Security Council);

foreign state (territory) is subject to special economic measures in accordance with [Federal Law](#) dd. December 30, 2006 No. 281-FZ "On special

economic measures" (Corpus of Laws of the Russian Federation, 2007, No. 1, art. 44) (hereinafter the "Special economic measures act");

foreign state (territory) is included in the list of states (territories) failing to meet the recommendations of the Financial Action Task Force on Money Laundering (FATF) prepared and published by a competent authority in accordance with [resolution](#) of the Government of the Russian Federation dd. March 26, 2003 No. 173 "Procedures for development and publication of a list of states (territories) failing to meet recommendations of the Financial Action Task Force on Money Laundering (FATF)" ("Corpus of Laws of the Russian Federation", 2003, No. 13, art. 1243; 2005, No. 44, art. 4562; 2011, No. 2, art. 375);

foreign state (territory) is referred by international organizations, including international non-government organizations, to states (territories) financing or supporting terrorism (as per the lists published on the websites of international organizations);

foreign state (territory) is referred by international organizations, including international non-government organizations, to states (territories) with a high level of corruption and/or other criminal activities (as per the lists published on the websites of international organizations);

state or territory is a state (territory) which is alleged by international sources to illegally produce or transfer (permit transfer of) narcotic substances, or a state (territory) which permits free sale of narcotic substances (except for states or territories using narcotic substances exclusively for medical purposes) (as per the lists published on the websites of international organizations).

If no lists of states (territories) referred to in [paragraphs five - seven](#) of this clause are published on the websites of international organizations, the non-bank financial institution may use a list of such states (territories) recommended by professional pools (associations, unions), self-regulatory organizations.

Along with foreign states (territories) referred to in this clause, the non-bank financial institution may additionally identify foreign states (territories) exposed to other factors affecting the assessment of client risks in the category "country risk".

3. Factors affecting the assessment of client risks in the category "risk associated with a certain type of client's transactions" include:

arrangement and maintenance of betting terminals and gambling venues (e.g. casinos, bookmaking offices), organizing and conducting lotteries, totes (pari-mutuel betting) and other risk-based games, in particular, in electronic form;

activities of microlenders;

activities of pawn shops;

selling, in particular on commission, objects of art, antiques, furniture, vehicles, articles of luxury;

receiving, buying and selling of precious metals, precious stones and jewelries containing precious metals and precious stones, scrap of related articles;

operations with real property and/or rendering intermediary services in operations with real property;

activities of tour operators and tourist agencies and other travel organization (tourist) activities;

charity activities and other non-regulated commercial activities;

activities associated with intensive cash turnover (including services in retail industry, catering, fuel sale at pumping stations and gas fueling stations);

activities associated with arms manufacturing or arms dealing;  
making transactions with residents of states (territories) referred to in [clauses 2 and 3](#) of exhibit 1 to Instruction of the Bank of Russia dd. August 7, 2003 No. 1317-U "Procedures for setting correspondent relations between authorized banks and non-resident banks registered in states and territories offering preferential tax treatment and/or exempting taxpayers from disclosure or provision of information on their financial transactions (off-shores)" registered by the Ministry of Justice of the Russian Federation on September 10, 2003 No. 5058, January 26, 2007 No. 8846, March 11, 2010 No. 16599, August 8, 2011 No. 21575, April 24, 2014 No. 32100 ("Bulletin of the Bank of Russia" dd. September 17, 2003 No. 51, dd. February 14, 2007 No. 7, dd. March 17, 2010 No. 16, dd. August 17, 2011 No. 47, dd. May 8, 2014 No. 43);

making transactions qualified by the AML/CFT ICR as exposed to high risk of money laundering and terrorist financing, or deals having the qualifying indicators listed in [exhibit 3](#) hereto, for which a decision was made to submit the related data to a competent authority;

activities of consumers' credit unions,

activities of agricultural consumers' credit unions;

other operations carried out by the non-bank financial institution at its own discretion.

**Exhibit 3**  
**to Regulation of the Bank of Russia dd.**  
**December 15, 2014 No. 445-P**  
**"Requirements to Regulations on**  
**Internal Control of Non-Bank Financial**  
**Institutions for the Purpose of Anti-**  
**Money Laundering and Combating the**  
**Financing of Terrorism"**

**Indicators of unusual transactions**

| Indicator group code*(1) | Indicator type code | Indicator description  |
|--------------------------|---------------------|--|
| 1                        | 2                   | 3  |
| 11                       |                     | General indications pointing to potential money laundering   |
|                          | 1101                | Complex or unusual transaction without a clear economic sense or obvious lawful intention  |
|                          | 1102                | Inconsistency of a transaction with the business goals of an organization set forth in its articles of association   |
|                          | 1103                | Repeated transactions or deals of a nature that suggests that they are made to evade the mandatory control procedures contemplated by the <a href="#">Federal Law</a>  |
|                          | 1106                | Refusal of a client (client's representative) to provide documents and information requested by the non-bank financial institution to ensure compliance with the anti-money laundering and counter terrorist financing <a href="#">laws</a>        |
|                          | 1107                | Client (client's representative) shows excessive concern with confidentiality of the transaction (deal), in particular, with regard to information disclosure to public authorities.   |
|                          | 1108                | Client (client's representative) ignores more beneficial conditions of obtaining a service (including commission charge), or offers an abnormally high commission or a commission clearly different from a normal commission for similar services. |
|                          | 1109                | Non-standard or unusually difficult instructions for settlements diverting from regular procedures used by a client (client's representative) or the regular market practice   |
|                          | 1110                | Undue hurry on which a client (client's representative) insists in making a transaction  |
|                          | 1111                | Considerable changes made by a client (client's representative) in a previously agreed plan of a transaction (deal) shortly before its making, especially in part of the direction of money or property flows                                      |
|                          | 1112                | Transaction order is issued by the client through a  |

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|  |      | representative (intermediary), and such representative (intermediary) fulfills the client's order without making a direct (personal) contact with the non-bank financial institution.  |
|  | 1113 | Obvious inconsistency of transactions made by the client (client's representative) through the non-bank financial institution with the regular market practice of effecting such transactions  |
|  | 1114 | Absence of information on a corporate client, foreign non-corporate entity, or self-employed entrepreneur in the official reference books, or failure to contact a client at the address or telephone number indicated therein   |
|  | 1116 | Difficulties faced by the non-bank financial institution when verifying data provided by a client, unjustified delays in submission of requested documents and information, provision of information which cannot be verified  |
|  | 1117 | A transaction made by the client who is a foreign public officer or an officer of a public international organization, or by the client acting on behalf (for the benefit of) of a foreign public officer or being a spouse, family member (in particular, directly ascending or descending family member (parent or child, grandparent or grandchild), full-blood or half-blood sibling (with common father or mother), adoptive parent or child) of a foreign public officer |
|  | 1118 | Making a transaction (deal) if a client or a client's representative acts on behalf (for the benefit of) non-profit organizations, foreign non-profit non-government organizations and their outlets, offices and branches operating in Russia, where such transaction (deal) is not subject to mandatory control in accordance with <a href="#">clause 1.2 of article 6</a> of the Federal Law  |
|  | 1119 | Making a transaction where a client or a client's representative, beneficiary, or founder in case of a corporate client is the director or founder of a non-profit organization, foreign non-profit non-government organization, or a department, office or branch thereof operating in Russia   |
|  | 1120 | Making transactions with objects of art  |
|  | 1122 | Making a transaction where a client is a non-profit organization, foreign non-profit non-government organization, or a department, office or branch thereof operating in Russia, provided that such transaction is not subject to mandatory control in accordance with <a href="#">clause 1.2 of article 6</a> of the Federal Law  |
|  | 1123 | Making a transaction where the non-bank financial institution files or earlier filed an inquiry to a competent authority about a client in accordance with <a href="#">sub-clause 5, clause 1, of article 7</a> of the Federal Law   |
|  | 1124 | Client's refusal of a one-off transaction raising suspicions   |

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|      |  | among employees of money laundering or terrorist financing  |
| 1179 |  | Making a transaction (deal) where a client is a person holding (including temporarily) a public post in Russia, post in the Board of Directors of the Central Bank of Russia, post in a federal state service where officers are appointed and dismissed by the President or the Government of Russia, position in the Central Bank of Russia, a state corporation or other organizations set up in Russia in accordance with the Federal Laws and included in the registers of positions approved by the President of Russia in accordance with <a href="#">article 7.3</a> of the Federal Law |
| 1180 |  | Client's request to return previously paid money at short notice to the client's account differing from an account from which the money was paid, in particular, to an account in a non-resident bank, or to a client's account in a bank other than the original paying bank, or to an account of a third party other than a transaction party, in particular, in case of termination of an agreement (deal)   |
| 1181 |  | Client's request to transfer money received as a result of a transaction (deal) to a client's account other than that specified in an agreement, in particular, to an account in a non-resident bank, or to a client's account in a bank other than the original paying bank, to an account of a third party other than a transaction party   |
| 1182 |  | Client's request to return previously paid money to the client or a third party in cash shortly after its remittance (or after making an agreement (deal)), in particular, in case of termination of an agreement (deal)  |
| 1183 |  | Receipt of money from a corporate client founded, in particular, by charitable organizations and/or funds or other non-profit organizations with an equity share that entitles them to influence the decisions of such corporate client   |
| 1184 |  | Receipt of money from a client where there are grounds to suggest that the client has received grants or other types of gratuitous financial assistance from foreign non-profit non-government organizations and/or their offices and branches operating in Russia  |
| 1185 |  | Making transactions with the use of remote service systems if a suspicion exists that such systems are used by a third party instead of a client (client's representative)  |
| 1186 |  | Client's unmotivated demand to terminate an agreement and/or return money paid by the client before the actual making of a transaction (deal)   |
| 1187 |  | Significant deviation of the amount of a transaction (deal) from the current market prices, in particular, on the client's insistence   |
| 1188 |  | Absence of a clear connection between the nature and field of client's activities and services requested by the client from an  |

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|    |      | organization dealing with money and other property  |
|    | 1189 | Making transactions (deals) with a corporate client or self-employed entrepreneur active for less than one year from the state registration   |
|    | 1191 | Making a transaction associated with receipt or provision of gratuitous financial assistance  |
|    | 1192 | Making a transaction (deal) on behalf of a client with an activity period not exceeding three months from the state registration, where a client has an insignificant equity as compared to the amount of the planned transaction (deal)  |
|    | 1193 | Use by a client of accounts opened in various credit organizations for settlements under one and the same agreement   |
|    | 1194 | Making settlements between transaction parties using third party settlement accounts  |
|    | 1195 | Repeated crediting of money by client's founders (directors) to replenish the client's floating capital   |
|    | 1199 | Other indications suggesting potential money laundering   |
| 12 |      | Indicators of unusual transactions with budget funds  |
|    | 1290 | Making a transaction (deal) upon request of a client where the client, founder or beneficiary is a participant of federal, regional or municipal target programs or national projects   |
|    | 1291 | Making a transaction (deal) upon request of a client where there are grounds to suggest that the client, founder, beneficiary owner or beneficiary receives subsidies, grants or other types of state support from the federal budget, budget of a constituent entity of the Russian Federation or a municipal budget   |
|    | 1292 | Making a transaction (deal) upon request of a client while acting as a contractor (subcontractor) under a government or municipal contract for supply of goods, performance of works or services, or under a civil law contract with a budget agency for supply of goods, performance of works or services (if the amount of such contract is equal to or exceeds RUB 6,000,000)* <sup>(2)</sup> , provided that the client has insignificant equity as compared to the amount of the planned transaction (deal), and the period of its activity does not exceed six months of the date of registration |
|    | 1299 | Other indications suggesting potential money laundering   |
| 13 |      | Indicators of unusual transactions, such as the country of registration, place of residence or stay of the client, counterparty, client's representative, beneficiary, beneficiary owner or member in case of a corporate client  |
|    | 1301 | Making a transaction (deal) if the client, counterparty, representative, beneficiary, beneficiary owner or member in case of a corporate client is registered in a state (territory) with a high terrorist or extremist risks   |

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|    | 1302 | Making a transaction (deal) if the client, counterparty, representative, beneficiary, beneficiary owner or member in case of a corporate client is registered in a foreign state (territory) which is subject to international sanctions  |
|    | 1303 | Making a transaction (deal) if the client, counterparty, representative, beneficiary, beneficiary owner, member in case of a corporate client is registered in a foreign state (territory) which is subject to the special economic measures in accordance with the <a href="#">Federal Law</a> ("Special Economic Measures Act")   |
|    | 1304 | Making a transaction (deal) in an amount less than RUB 600,000 or a currency equivalent thereof, where the client, counterparty, representative, beneficiary, beneficiary owner or member in case of a corporate client has a registered address, place of residence or stay in a state (territory) failing to meet the recommendations of the Financial Action Task Force on Money Laundering (FATF), or with the use of an account in a bank registered in such state (territory) |
|    | 1305 | Making a transaction (deal) where the client, counterparty, representative, beneficiary, beneficiary owner or member in case of a corporate client is registered a state (territory) referred by international organizations (including international non-government organizations) to states (territories) with a high level of corruption and/or other criminal activities  |
|    | 1390 | Making a transaction (deal) if the client, counterparty, representative, beneficiary, beneficiary owner or member in case of a corporate client is registered in a state or territory offering preferential tax treatment and/or exempting taxpayers from disclosure or provision of information on their financial transactions (offshore), or has the account opened in a bank registered in such state or territory  |
|    | 1399 | Other indications suggesting potential money laundering   |
| 14 |      | Indicators of unusual transactions with money or other property in cash or transfer of money  |
|    | 1404 | Transfer of money to an anonymous (numbered) account (deposit) abroad, or receipt of money from an anonymous (numbered) account (deposit) abroad in an amount less than RUB 600,000 or a currency equivalent thereof  |
|    | 1490 | Client insisting on making settlements in cash  |
|    | 1491 | Regular receipt of money due under a transaction (deal) in cash on the client's initiative  |
|    | 1492 | Making a transaction (deal) in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof by receiving or paying cash funds, where participants are non-residents having a place of registration, residence or stay in a member state of the Customs Union  |

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|    | 1499 | Other indications suggesting potential money laundering  |
| 15 |      | Indicators of unusual transactions with loan agreements  |
|    | 1590 | Granting or obtaining a loan with an interest rate below the <a href="#">base rate</a> set by the Bank of Russia   |
|    | 1591 | Obtaining a loan from a non-resident and/or granting loan to a non-resident  |
|    | 1599 | Other indications suggesting potential money laundering  |
| 18 |      | Indicators of unusual transactions in international settlements  |
|    | 1802 | Payment of a forfeit (penalty, fine) by a resident to a non-resident for failure to perform a contract for supply of goods (performance of works, services), or for breach of such contract, if the amount of a forfeit (penalty, fine) exceeds 10 percent of the cost of outstanding goods (works, services)  |
|    | 1804 | An agreement (contract) provides for export of goods (works, services) by a resident, or payments associated with import of goods (works, services) to a non-resident registered in a state or territory offering preferential tax treatment and/or exempting taxpayers from disclosure or provision of information on their financial transactions (offshore)                           |
|    | 1881 | Money or goods (works, services) are intended for a non-resident who is not a party to an agreement (contract) providing for import (export) of goods (works, services) by a resident  |
|    | 1882 | Transfer of money to a non-resident under international trade deals associated with rendering of information, consultancy and marketing services, delivery of intellectual property and exclusive title thereto and other types of intangible services   |
|    | 1899 | Other indications suggesting potential money laundering  |
| 19 |      | Indicators of unusual transactions with securities and derivative financial instruments  |
|    | 1990 | Making transactions with securities which are not backed by assets of issuers, and bills of exchange issued by legal entities having a minimum equity capital and a period of activity less than one year of the date of registration  |
|    | 1991 | Purchasing of securities by an individual for cash in an amount not exceeding RUB 600,000 or a currency equivalent thereof   |
|    | 1999 | Other indications suggesting potential money laundering  |
| 22 |      | Indicators of unusual transactions suggesting potential terrorist financing  |
|    | 2201 | The registered address of a corporate client, residential address or place of stay of a client being an individual, or client's representative, beneficiary, beneficiary owner or founder (in case of a corporate client) coincides with the address of an organization, or place of residence (stay) of an individual included in the List of organizations and individuals or a person |

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|  |      | subject to money or property freezing (blocking) by the decision of an interdepartmental coordination authority involved in prevention of terrorist financing  |
|  | 2202 | Client, client's representative, beneficiary, beneficiary owner or founder of a corporate client is an immediate relative of a person included in the List of organizations and individuals  |
|  | 2203 | Currency or property transaction (deal) is made by a person repeatedly included in the List of organizations and individuals during a period between exclusion from the List of organizations and individuals and subsequent inclusion therein   |
|  | 2204 | Currency or property transaction (deal) is associated with manufacturing, processing, transportation, storage or sale of nuclear materials, radioactive substances and waste, other chemical substances, bacteriological materials, weapons, ammunition and components thereto, explosive substances and other products (goods) prohibited or restricted for sale on open market, unless this stems from the nature of the client's business |
|  | 2205 | Currency or property transaction (deal) is associated with purchase or sale of military apparel, means of communication, medicines, long-life products, unless this stems from the nature of the client's business   |
|  | 2206 | Currency or property transaction (deal) made as part of international trade activities is associated with purchase and/or sale of poisonous and/or potent substances, unless this stems from the nature of the client's business   |
|  | 2208 | Transactions associated with money expending by Russian public organizations and associations (religious organizations, political parties and associations) and funds in a way inconsistent with their objectives stated in the constitutional (charter) documents   |
|  | 2209 | Transactions associated with money expending by Russian offices and branches of foreign non-profit non-government organizations inconsistent with their stated objectives  |
|  | 2210 | Identity data of a transaction party coincide with the identity data of an individual specified in a request of a competent authority for provision of additional information for the purposes of combatting terrorist financing, if such request notes that transactions of the respective individual are subject to special attention  |
|  | 2290 | Last name, first name, patronymic and place of birth of a client being an individual, beneficiary, beneficiary owner, or founder of a corporate client, foreign non-corporate entity or transaction party coincide with the last name, first name, patronymic and place of birth of an individual included in the List of organizations and individuals, or a person subject to money or   |

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|    |      | property freezing (blocking) by the decision of an interdepartmental coordination authority involved in prevention of terrorist financing, or a person whose transactions on bank accounts (deposits) and other currency or property transactions were suspended by a court decision upon request of a competent authority, and there are no other data to confirm full equivalence of such persons                      |
|    | 2299 | Other indications suggesting potential terrorist financing   |
| 31 |      | Indicators of unusual transactions revealed in insurance activities  |
|    | 3101 | Client's offer to substantially (more than twofold) increase the insured sum with a commensurate increase of the insurance premium under an existing life insurance, endowment insurance; pension insurance; annuities), and/or participating annuity contracts  |
|    | 3102 | Repeated amending of an insurance agreement due to replacement of the insured, indemnified party, or beneficiary   |
|    | 3103 | Periodic making of two or more life insurance agreements for a third party for up to five years  |
|    | 3104 | Insured offers to reinsure a risk with an organization registered in a state or territory offering preferential tax treatment and/or exempting taxpayers from disclosure or provision of information on their financial transactions (offshore), or with insurance and/or reinsurance companies without ratings of the international rating agencies, and making transactions under an agreement with such organizations |
|    | 3105 | Client makes insurance agreements with organizations located outside the region where it resides (is registered)   |
|    | 3106 | Client proposes the insurer to extend coverage to include risks that are beyond the scope of the client's normal operations  |
|    | 3107 | Client is more concerned about an opportunity of early insurance agreement termination rather than compliance with the policy (agreement) terms  |
|    | 3108 | Client makes insurance agreements where the amount of insurance premiums exceeds its paying capacity   |
|    | 3109 | Provision or acceptance of an insurance service at a rate that is more than twice as high as the average rate for similar services on the internal insurance market  |
|    | 3110 | Transfer of money in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof as a fee of insurance agents for representing the insurer in dealing with the insured under insurance (reinsurance) agreements   |
|    | 3111 | Transfer of money in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof as a fee of insurance brokers under insurance (reinsurance) agreements   |

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|    | 3112 | Payment of premium by the reinsured to the reinsurer under a reinsurance agreement made with the latter to cover indemnity payment risks, subject to possible fees for making such agreement, if the amount of such transaction is equal to, or exceeds, RUB 3,000,000 or a currency equivalent thereof  |
|    | 3113 | Granting of an interest-free loan by an insurance organization to an individual within the claim reserve (under an existing life insurance, endowment insurance; pension insurance; annuities), and/or participating annuity contracts), and payment of cash surrender value under such agreements in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof   |
|    | 3199 | Other indications suggesting potential money laundering  |
| 32 |      | Indicators of unusual transactions revealed in professional activities on the securities market, management of investment funds or non-government pension funds*(3)  |
|    | 3201 | Client pays an amount equal to, or exceeding, RUB 600,000 as a lump sum or installment in cash, at the cashier office of a trader.   |
|    | 3202 | Trader effects, at its expense or at the expense of the client, on an over-the-counter market or through operators of the securities market (hereinafter securities market operators) based on two dedicated requests, deals with securities and/or other financial instruments in a minimum amount of RUB 200,000 each, where the buyer and the seller act on behalf of the same beneficiary.   |
|    | 3203 | Trader effects mutual deals, at its expense or at the expense of the client, where the parties to such deals (traders or their clients) alternate regularly, acting one time as a seller and another time as a buyer, buying/selling, as a package or in parts, the same securities and/or other financial instruments in approximately the same amount (in case of mutual deals made on an over-the-counter market or through securities market operators based on two dedicated requests). |
|    | 3204 | Trader effects, at its expense or at the expense of the client, sale and purchase of the same securities, as a package or in parts, in approximately the same amount during one trading day, provided that the selling price is lower or equal to the purchase price, where the market price of a security cannot be determined based on the results of the same trading day.  |
|    | 3205 | Trader effects, at its expense or at the expense of a client, sale and purchase of securities and/or other financial instruments with one counterparty with a combined profit or loss for the respective trader or its client of RUB 200,000 and more (in case of over-the-counter deals or deals made through securities market operators based on two dedicated requests)  |
|    | 3206 | Trader effects, at its expense or at the expense of a client, sale   |

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|  |      | and purchase of securities which are not dealt with by securities market operators, at a price significantly differing from the price of at least one of the deals with such security made by a trader on an over-the-counter market within 30 days immediately preceding the deal in question   |
|  | 3207 | Trader effects, at its expense or at the expense of a client, sale and purchase of securities which are dealt with by securities market operators, on an over-the-counter market or through the securities market operator based on two dedicated requests at a price significantly differing from the market price of such security calculated at the end of the trading day on which the deal was made |
|  | 3208 | Making regular transactions associated with registration of title to securities with the same securities in approximately the same amount, where the same parties alternatively dispose and acquire such securities, except stock market and REPO trading  |
|  | 3209 | Regular payments to a current (depository) account and debiting a current (depository) account of the same securities in approximately the same amount (except stock market and REPO trading)  |
|  | 3210 | Regular crediting to a current (depository) account and debiting from a current (depository) account of the same securities in the same amount, where their quantity at the start and end of a trading day remains the same (except stock market and REPO trading)   |
|  | 3211 | Transfer of client's money to its account in a non-resident bank, or at the client's request to a third party account in a non-resident bank   |
|  | 3212 | Making transactions where the same financial instrument is sold a few times and bought out in transactions with the same party   |
|  | 3213 | Making settlements between parties to a transaction with financial instruments using settlement accounts in credit organizations registered outside Russia   |
|  | 3214 | Second and each subsequent depositing (withdrawal) of shares of a Russian issuer in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof to (from) a depository account as part of deals made outside Russia   |
|  | 3215 | Second and each subsequent depositing (withdrawal) of shares of a Russian issuer in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof to (from) a depository account as part of trading shares of this issuer outside Russia  |
|  | 3216 | Sale of foreign securities in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof on behalf of a non-resident, where such securities were credited to a depository account opened for this non-resident as part of deals made other than in on-exchange trading   |

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|  | 3217 | Depositing (withdrawal) of foreign securities in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof to (from) a depository account opened for a non-resident client   |
|  | 3218 | Trader purchases, on its behalf and at its expense, foreign securities from a non-resident in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof  |
|  | 3219 | Trader purchases, at the client's request, on behalf and at the expense of the client, or on its behalf and at the client's expense, foreign securities from a non-resident for an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof.   |
|  | 3220 | Trader, acting under a fiduciary securities management agreement, purchases foreign securities from a non-resident in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof.   |
|  | 3221 | Trader purchases, on its behalf and at its expense, securities permitted for on-exchange trading in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof other than in on-exchange trading.   |
|  | 3222 | Trader purchases, at the client's request, on behalf and at the expense of the client, or on its behalf and at the client's expense, securities permitted for on-exchange trading in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof other than in on-exchange trading.  |
|  | 3223 | Trader, acting under a fiduciary securities management agreement, purchases securities permitted for on-exchange trading in an amount equal to or exceeding RUB 600,000 or a currency equivalent thereof other than in on-exchange trading.   |
|  | 3224 | Trader, acting on behalf of the client in on-exchange trading, sells securities in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof, where these securities were purchased by the trader for this client other than in on-exchange trading.   |
|  | 3225 | Transfer of securities from a depository account of one client to a depository account of another client, if depository accounts of both clients were opened in a depository of a trader, and the trader itself is not a party (in particular on behalf of its client) to a deal that gave ground to this transactions <a href="#">*(4)</a>                       |
|  | 3226 | Trader, except credit institutions, fulfills the client's request for transfer of money in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof to a third party, except request to transfer money to a bank account of another trader and/or a clearing account of a clearing organization opened for management of the client's funds |
|  | 3227 | Recognizing client's money received from third parties on a bank account of a trader, except money received from a bank   |

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|  |      | account of another trader and/or a clearing account of a clearing organization opened for management of the client's funds, as well as money from deals made by such trader, in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof   |
|  | 3228 | Trader sells, on behalf of a non-resident client, securities in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof as part of trading arranged by securities market operators, where such securities were transferred to a depository account opened for this non-resident client from a depository account opened by the same trader, as part of deals made other than in trading arranged by securities market operators, except for marginal deals  |
|  | 3229 | Trader sells, on behalf of a non-resident client, securities in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof as part of trading arranged by securities market operators, where such securities were transferred to a depository account opened for this non-resident client from an account opened with another trader   |
|  | 3230 | Return of securities dealt with by a non-resident client as part of marginal deals to a trader, in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof, if returned securities were received as part of deals made other than in trading arranged by securities market operators  |
|  | 3231 | Second and each subsequent depositing (withdrawal) of securities permitted for trading on stock exchanges and/or exchanges of other securities market operators, in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof, to (from) a depository account opened for a non-resident client as part of deals made other than in trading arranged by securities market operators, except depositing (withdrawal) to (from) a depository account of shares of a Russian issuer dealing with such shares outside Russia through placing and trading in foreign securities and making REPO deals |
|  | 3232 | Transfer of securities recognized by the Russian depository from a resident client's depository account to the books of a foreign depository, where such securities were credited to a depository account in a Russian depository as part of deals made other than in on-exchange trading  |
|  | 3299 | Other indications suggesting potential money laundering  |
|  | 33   | Indicators of unusual transactions in non-government pension insurance and compulsory pension insurance  |
|  | 3301 | Payment of surrender value by a non-government pension fund, in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof, to a depositor or member of a non-   |

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|    |      | government pension fund in cash  |
|    | 3302 | Payment of non-government pension by a non-government, in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof, to members of a non-government pension fund in cash                                  |
|    | 3303 | Transfer of surrender value equal to, or exceeding, RUB 600,000 or a currency equivalent thereof, from an account of a non-government pension fund to an account of a depositor or member of a non-government pension fund     |
|    | 3304 | Transfer of non-government pension equal to, or exceeding, RUB 600,000 or a currency equivalent thereof from an account of a non-government pension fund to an account of a non-government pension fund participant            |
|    | 3305 | Making transactions using own funds or property to secure the statutory activities of a non-government pension fund in an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof                          |
|    | 3306 | Transfer by a non-government pension fund of an amount equal to, or exceeding, RUB 600,000 or a currency equivalent thereof to non-resident accounts as part of transactions unrelated to its statutory activities             |
|    | 3399 | Other indications suggesting potential money laundering  |
| 37 |      | Indicators of unusual transactions in pawn shop activities   |
|    | 3701 | Repeated (five times a year and more) receipt of loans secured by jewelries without their subsequent buyout  |
|    | 3702 | Repeated (two times a year and more) placement of individual's property in a pawn shop, where such transactions are effected in a constituent entity of the Russian Federation outside the place of residence of an individual |
|    | 3703 | Delivery, on commission, pledge or for sale, of jewelries made of precious metals and precious stones and having signs of false hallmark imprints  |
|    | 3704 | Delivery, on commission, pledge or for sale, of jewelries made of precious metals and precious stones without hallmark imprints  |
|    | 3705 | Regular delivery, on commission, pledge or for sale, of several jewelries and/or generic jewelries by an individual, or generic jewelries by a group of individuals, including jewelries with labels                           |
|    | 3706 | Regular delivery, on commission, pledge or for sale, of cut precious stones or a batch of cut precious stones by an individual (either with or without certificates)   |
|    | 3708 | Delivery of a temporarily used vehicle to a pawn shop on commission or pledge  |
|    | 3799 | Other indications suggesting potential money laundering  |

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| 44 |      | Indicators of unusual transactions in consumer lending* <a href="#">(5)</a>   |
|    | 4401 | Extension of a loan (loans) equal to, or exceeding, RUB 600,000, to a guardian or another person being a legal representative (in particular, under a power of attorney) of a member (stockholder) of a consumers' credit union   |
|    | 4402 | Making several personal saving (loan) agreements with one member (stockholder) of a consumers' credit union within three months in an amount equal to, or exceeding, RUB 600,000  |
|    | 4403 | Issue of an instruction by a member (stockholder) of a consumers' credit union to transfer his/her money to a third party   |
|    | 4404 | Making a transaction with government or municipal securities in an amount equal to, or exceeding, RUB 600,000   |
|    | 4405 | Splitting cash amounts placed by stockholder among several agreements over a short period of time, provided that the combined amount of the placed money (if covered by a single agreement) is equal to, or exceeds, RUB 600,000  |
|    | 4406 | Making, over a short period of time of several short-term agreements in the name of one stockholder, for transfer of personal savings, transfer of money under a loan agreement, or making contributions by such stockholder, even if the value of an agreement or contribution is less than RUB 600,000, with subsequent consolidation of amounts of savings, loans or contributions in one agreement providing for transfer and/or subsequent receipt of cash funds |
|    | 4407 | Making, over a short period of time of several short-term agreements in the name of one stockholder, even if the agreement value is less than RUB 600,000, with subsequent termination of such agreements.  |
|    | 4408 | Making, over a short period of time of several agreements in the name of one stockholder, providing for return of money upon demand of a stockholder, even if the agreement value is less than RUB 600,000, with subsequent consolidation of amounts in one agreement and/or receipt of cash funds after a relatively short period of time.   |
|    | 4409 | Granting of a loan to a member (stockholder) of a credit union in an amount equal or close to the value of a contribution or money transferred under a personal saving (loan) agreement   |
|    | 4410 | Making, over a short period of time, of agreements for a legal entity and its corporate affiliate, or a legal entity and its individual affiliate or an individual being in employment relations with the former, where one of the said entities contributes money to a credit union, and the other entity receives money from a credit union in the same or similar amount, even if the agreement value is less than RUB 600,000                                     |
|    | 4499 | Other indications suggesting potential money laundering   |

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| 45 |      | Indicators of unusual transactions in microfinance operations   |
|    | 4501 | Issue of an instruction by a borrower to a microlender to transfer a loan obtained to a bank account opened in a department of a credit institution in a region outside the borrower's place of residence   |
|    | 4502 | Making, over a short period of time, of loan agreements with mutually affiliated entities, or with a legal entity and an individual being in employment relations with the former, where one person receives a loan, and the other person repays such loan                  |
|    | 4503 | Early repayment of a loan, partially or in full, granted by a microlender, if it is made by a third party   |
|    | 4504 | Change of the founder (member) and/or director of a corporate borrower, who obtained a loan from a microlender, shortly after obtaining a loan  |
|    | 4505 | Granting, over a short period of time, of three and more loans in a total amount equal to, or exceeding, RUB 600,000, issued by a microlender to different borrowers acting through the same representative (intermediary), or to borrowers affiliated with the same entity |
|    | 4506 | Granting of a loan by a microlender subject to its return by a borrower from funds raised as part of dedicated federal programs (e.g. maternity (family) fund, housing certificates)  |
|    | 4507 | Regular raising of large amounts of money received by a microlender from the same or several mutually affiliated entities registered outside the region where the microlender has its place of business   |
|    | 4599 | Other indications suggesting potential money laundering   |

\*(1) The indicators of [groups 11 - 22](#) are generalized and shall be included by institutions in the list of unusual transactions (deals) made in accordance with [paragraph two of clause 5.2](#) hereof, subject to the specifics of activity of such institutions (depending on whether institutions are involved in activities that allow identifying unusual transactions (deals) included in groups 11 - 22).

Institutions shall include in their list of unusual transactions (deals) prepared in accordance with [paragraph two of clause 5.2](#) hereof the indicators provided in special groups ([groups 31 - 45](#)) according to the specific activities (business) of institutions.

\*(2) These data can be obtained on the website [www.zakupki.gov.ru](http://www.zakupki.gov.ru).

\*(3) Traders being credit institutions should consider the indicators included in [group 32](#) in preparing the list of indicators signaling unusual transactions, and the program for identification of transactions subject to mandatory control, and transactions raising suspicions of money laundering or terrorist financing.

\*(4) This does not apply to traders acting as clearing depositories on the securities market.

\*(5) The indicators included in [group 44](#) apply to consumers' credit unions, including agricultural credit unions.