

SBERBANK'S ANTI-MONEY LAUNDERING QUESTIONNAIRE FOR FINANCIAL INSTITUTIONS

Full name of institution: **Sberbank of Russia**
Short name of institution: **Sberbank**
Address of institution: 19 Vavilova St., Moscow 117997, Russia
Telephone number: +7 495 505 8895
Facsimile number: +7 495 957 5747
Website: <http://www.sberbank.ru/> (in Russian)
<http://www.sberbank.ru/en/> (in English)
SWIFT: SABR RU MM

1. Is your institution subject to the laws of your country for the prevention of money laundering?

Sberbank is subject to the Russian Federal Law of August 7, 2001 No. 115-FZ «On Combating Legalisation (Laundering) of Criminally Gained Income and Financing of Terrorism» (the Federal Anti-Money Laundering Law) as amended from time to time.

2. Please provide the name of your Regulatory Authority.

Full name: Central Bank of the Russian Federation (Bank of Russia)
Address: 12 Neglinnaya St., Moscow 107016, Russia
Website: <http://www.cbr.ru> (in Russian)
<http://www.cbr.ru/eng> (in English)
SWIFT: CBRF RU MM

3. Could we obtain copies of your charter and banking licence?

Copies of Sberbank's Charter and General Licence to conduct banking operations No. 1481 are available on our website only in Russian at:
http://www.sberbank.ru/moscow/ru/about/normative_documents/

4. Has your institution established written policies, procedures and controls in accordance with FATF's «The 40 Recommendations» and «9 Special Recommendations on Terrorist Financing»?

The anti-money laundering policies, procedures and controls adopted by Sberbank are governed by the Internal Control Regulations Against Legalisation/Laundering of Criminal Proceeds which fully comply with the requirements of the Federal Anti-Money Laundering Law. This regulatory document is based on FATF's «The 40 Recommendations» and «9 Special Recommendations on Terrorist Financing».

5. Could we obtain a copy of your internal AML/KYC policies for our files?

Our internal documents are not available to the third parties. Additional information on our internal AML/KYC policies and controls may be provided on a case-by-case basis to selected foreign financial institutions which maintain correspondent accounts in our name, in order for them to comply with the requirements of their local AML/KYC legislation. In the future, this AML Questionnaire will be supplemented with additional questions most frequently asked by our correspondents.

6. Please confirm whether your written AML/KYC policies include the following:

- | | | |
|---|---|-----------------------------|
| • Internal controls and procedures | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| • Thorough client identification | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| • Client due diligence procedures | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| • Risk focused assessment of customer base and their transactions | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| • Prohibition of anonymous accounts | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| • Employee training programme | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| • Independent audit/compliance function | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

7. Does your institution maintain records of customer identification and account files?

Yes. In conformity with the legislation of the Russian Federation records of customers identification and account files must be kept for a minimum period of 5 years.

8. Does the legislation of your country limit or prohibit opening or maintenance of anonymous accounts?

In conformity with Article 7 of the Federal Anti-Money Laundering Law, financial institutions are prohibited from opening anonymous accounts (deposits). In practice, each potential customer or account holder (individual or legal entity) must present a defined set of documents which would allow the financial institution to uniquely identify him/her/them.

9. Please provide the name of the official authority to which you must report in case of a suspicion of money laundering or terrorist financing.

According to the Decree by the Russian Federation President dated March 9, 2004 No. 314 «On the System and Structure of the Federal Executive Bodies of Power», The Federal Financial Monitoring Service is the body responsible for anti-money laundering issues.

10. Does your institution have procedures to identify transactions structured to avoid AML reporting requirements?

Yes. Such procedures have been included into our standard inhouse AML/KYC regulations.

11. What action(s) do you typically take when an unusual transaction is detected as a result of your ongoing monitoring process?

In conformity with Article 7 of the Federal Anti-Money Laundering Law, we identify our clients, take appropriate and permissible action(s) to identify beneficiaries, regularly update information on our clients and beneficiaries, furnish information on the unusual transactions and transactions which are subject to mandatory control and reporting to the authorities.

We are not entitled to disclose this information to the third parties as Article 4 of the Federal Anti-Money Laundering Law explicitly forbids us «to inform clients and other persons on measures taken against legalisation (laundering) of criminally gained income and financing of terrorism».

12. Does your institution have a policy of protecting employees if they, in good faith, report any suspicious transactions?

Employees who, in good faith, report any suspicious transactions to the authorities are not in need of protection because according to the Federal Anti-Money Laundering Law no information on such employees must be disclosed.

13. How are your AML/KYC policies and procedures communicated and enforced within your network of domestic and foreign offices? Are they regulated by the same policies and procedures for anti-money laundering?

The AML/KYC policies, procedures and controls applied by Sberbank's domestic branches are totally identical to those in place at the Head Office.

Sberbank has three foreign subsidiaries located in Kazakhstan (SB Sberbank JSC), Ukraine («SBERBANK OF RUSSIA» JSC) and Belarus (JSC «BPS-Bank»), which are independent legal entities registered and operating under the laws of their respective countries of residence. They are not subject to the Russian laws. Therefore, due to the specific features of the laws of the above-mentioned foreign countries, Sberbank is not entitled to require compliance by SB Sberbank JSC, «SBERBANK OF RUSSIA» JSC and JSC «BPS-Bank» with the provisions of the Russian laws on countering the legalisation (laundering) of criminal incomes and the financing of terrorism.

14. Could you confirm that you do not maintain relationships with the shell banks (defined as banks without a physical presence in any country and not affiliated to a regulated bank that has a physical presence)?

Sberbank maintains no correspondent accounts or other forms of the relationships with the shell banks whatsoever, and we neither provide nor have the intention of providing in the future any banking services to such institutions.

15. Does your institution have policies prohibiting direct use of your correspondent accounts by the third parties on their behalf?

Yes. Sberbank's inhouse regulations do not allow for the third parties to use our correspondent accounts on their own behalf. All correspondent account relationships are established, maintained, monitored and used solely by and on behalf of Sberbank.

16. Does your institution have any units operating under an Offshore Banking licence (An Offshore Banking Unit is defined as a bank with a licence to conduct licensed banking activities except such banking activities involving the citizens, or in the local currency of, the licence-issuing jurisdiction)?

No.

17. Could you briefly describe the audit function that regularly reviews and assesses the quality of the AML/KYC programme of your institution?

The external audit of the quality of Sberbank's AML/KYC programme is conducted by an independent auditor of the bank twice a year. The programme is also subjected to monitoring by the relevant divisions of Bank of Russia.

The staff of Sberbank's Internal Control, Inspections and Audit Department carry out ongoing monitoring of the AML/KYC system, and (as per pre-defined plans) specialized checks to ensure that the system is compliant with the legislation of the Russian Federation, statutory acts of Bank of Russia and Sberbank's internal AML/KYC regulations.

18. Please describe briefly Sberbank's policies regarding customer visits and minimum documentation requirements.

Sberbank fully complies with the legislation of the Russian Federation and statutory acts of Bank of Russia on identification of clients and beneficiaries for the purpose of AML/KYC (including Bank of Russia's Regulation of August 19, 2004 No. 262-P «On Identification of Clients and Beneficiary Parties by Credit Organizations for Anti-Money Laundering Purposes»).

19. Please briefly describe the employee AML/KYC training programme and its requirements.

Sberbank's AML/KYC training programme has been developed according to Bank of Russia's Direction of August 9, 2004 No. 1485-U «On Requirements for Training Staff of Credit Institutions» and The Federal Financial Monitoring Service's Order of August 3, 2010 No. 203 «On Approval of Regulation on Requirements for Training Staff of Institutions Conducting Transactions with Cash and Other Assets for AML/KYC Purposes». Sberbank's employees responsible for compliance with the AML/KYC legislation of the Russian Federation, statutory acts of Bank of Russia and other authorities, as well as internal regulations of Sberbank, undergo introductory (primary) instruction, target instructing (for Sberbank's employees working as professional participants in the securities market) and post-instruction check followed by an annual mandatory enhancement course. Additional enhancement courses for Sberbank's employees working as professional participants in the securities market is conducted every three years. In case of amendments to the legislation of the Russian Federation or statutory documents of Bank of Russia or other authorities (and also in case of enactment of new legislative or statutory acts), an off-schedule (additional) training is provided.

20. Does your institution have inhouse policies covering relationships with politically exposed persons consistent with industry best practices?

Under the current Russian legislation all transactions and business activities of politically exposed residents are monitored, controlled, and reported in the same course as transactions and business activities of other customers. Stricter monitoring is conducted in relation to transactions with funds or other assets by foreign public officials, their spouses and close relatives, or on behalf of those persons.

21. In relation to the politically exposed persons (PEP), please confirm that your institution...:

- ...scrutinizes whether the customer is a PEP within the customer acceptance process Yes No
- ...has appropriate risk management systems to determine whether the customer is a PEP Yes No
- ...obtains senior management's approval for establishing business relationships with PEPs Yes No
- ...takes reasonable measures to establish the PEP's source of wealth and source of funds Yes No
- ...conducts enhanced ongoing monitoring of the business relationships with PEPs Yes No

22. Please provide a current list of your Board of Management.

The Board of Sberbank currently includes 14 members:

Name	Title
1. Herman O. Gref	Chairman of the Board and Chief Executive Officer
2. Sergey N. Gorkov	Deputy Chairman of the Board
3. Andrey M. Donskikh	Deputy Chairman of the Board
4. Bella I. Zlatkis	Deputy Chairman of the Board
5. Anton A. Karamzin	Deputy Chairman of the Board
6. Evgeny A. Korolev	Deputy Chairman of the Board
7. Stanislav K. Kuznetsov	Deputy Chairman of the Board
8. Alexander Yu. Torbakhov	Deputy Chairman of the Board
9. Denis A. Bugrov	Member of the Board, Senior Vice-President
10. Olga N. Kanovich	Member of the Board, Senior Vice-President
11. Victor M. Orlovskiy	Member of the Board, Senior Vice-President
12. Alexander V. Bazarov	Member of the Board, Vice-President, Director of Major Accounts Department
13. Andrey F. Golikov	Member of the Board, Vice-President, Director of Treasury and Financial Markets Department
14. Alexander V. Morozov	Member of the Board, Vice-President, Director of Finance Department

23. Please describe the penalties for money laundering and terrorist financing in your country.

A bank's failure to comply with Articles 6 and 7 of the Federal Anti-Money Laundering Law (except Clause 3 of Article 7), may lead to withdrawal (revocation) of the banking licence as per the current Russian legislation.

Institutions and their officials guilty of the breach of the above-mentioned Federal Law bear administrative responsibility, and will be civilly and criminally liable under the Russian laws. The banks bear administrative responsibility for a failure to comply with anti-money laundering laws in terms of registering, storing, and disclosing information on transactions subject to mandatory control and in terms of internal control arrangements.

24. Has your bank been involved in any regulatory or criminal enforcement actions resulting from violations of any anti-money laundering laws or regulations in the past 5 years?

No.

25. Could you provide your latest Financial Statements in accordance with the IFRS (International Financial Reporting Standards)?

The latest financial statements in accordance with the IFRS as well as other information on Sberbank are available through our website at <http://www.sberbank.ru/en/>

26. Please provide current ownership structure of your institution.

Sberbank's shares are owned by more than 260,000 shareholders, as follows:

	Share in charter capital (as of the record date of April 16, 2010):
Bank of Russia	57,58 % (60,25 % of the voting shares)
Foreign legal entities	32,12 %
Domestic legal entities	4,21 %
Foreign private investors	0,01 %
Domestic private investors	6,08%

27. Are your bank's shares publicly traded?

Sberbank's shares are publicly traded except for the portion owned by Bank of Russia as defined in Clause 26 above.

Sberbank's ordinary and preference shares are in the A1 (blue chips) Quotation Lists of the Moscow Interbank Currency Exchange (MICEX). Sberbank's ordinary shares are listed in the A1 Quotation List of the Russian Trading System «Stock Exchange» (RTS «Stock Exchange»); preference shares, in the B Quotation List.

28. Could we obtain a copy of your latest USA PATRIOT Act Certification?

You can download a copy of Sberbank's USA PATRIOT Act Certification in the *.pdf format directly from our website by visiting the following link:

http://www.sberbank.ru/common/_en/img/uploaded/4-0.pdf

This document is also available on the Bankers' Almanac™ Due Diligence Repository. Please contact the Bankers' Almanac at www.bankersalmanac.com for further details.

Alternatively, you can contact us directly through the telephone numbers provided in Clause 32 below.

29. Could we obtain a list of your Standard Settlement Instructions (SSI)?

The most recent list of our Standard Settlement Instructions for the world's major currencies is available in the *.pdf format through the Internet at:

http://www.sberbank.ru/common/_en/img/uploaded/files/eng/SSI-English.pdf

If, for whatever reason, you require authenticated confirmation of our SSI by SWIFT, please either send us your enquiry by SWIFT or contact us directly through the numbers provided in Clause 32 below.

30. Could we obtain a list of your Loro correspondent banks (i.e. banks that maintain accounts with you)?

This information is available in the *.pdf format on our website only in Russian.

The list of our Russian Loro correspondents:

http://www.sberbank.ru/common/img/uploaded/files/legal_person/LOROrez.pdf

The list of our foreign Loro correspondents:

http://www.sberbank.ru/common/img/uploaded/files/legal_person/LOROnrez.pdf

31. Has your institution designated a Money Laundering Reporting Officer to monitor suspicious activities and train staff in internal money laundering prevention controls and procedures? Please provide the Officer's name and telephone and fax numbers.

Yes. In conformity with the requirements of the Federal Anti-Money Laundering Law, Sberbank has designated such an officer.

Mr. Vladimir V. Kraynov, Deputy Director of Security Department, Head of General Security Division

Tel./Fax: +7 495 957 5426

E-mail: compliance@sberbank.ru

32. If there are any further questions, who is the appropriate person within Sberbank to contact first?

Any information (including the most recent updates) that Sberbank finds appropriate to make publicly accessible is available from our website. Therefore, if you need any information on Sberbank which has not been addressed in this Questionnaire, we strongly recommend that you check our website first.

Financial institutions are encouraged to direct their further enquiries to:

Mr. Andrey G. Ivanov, Head of Trade & Export Finance and Financial Institutions Department

Tel.: +7 495 505 8895

Fax: +7 495 957 5747

E-mail: icb@sberbank.ru



**Andrey M. Donskikh, Deputy Chairman of the Board
Sberbank of Russia**

Executed on this 9 day of February, 2011