

The list of required data in relation to the non-resident counterparty, as well as the list of securities for obtaining permission to conclude a transaction with securities in order to comply with Decree of the President of the Russian Federation № 81 dated on 01.03.2022 «On additional temporary economic measures to ensure the financial stability of the Russian Federation», Decree of the President of the Russian Federation № 138 dated on 03.03.2023 «On additional temporary economic measures related to the circulation of securities»

For which securities is applicable? (clause 1 of Decree № 138)	<ul style="list-style-type: none"> – List of securities: – Shares of a russian joint-stock company; – Federal loan bonds; – Bonds of a russian issuer, the centralized accounting of rights to which (mandatory centralized storage of which) is carried out by the russian depository; – Investment units of a russian unit investment fund.
What information is required for securities?	<p>No specific requirements have been set. Data are required to fully identify the security, for example (in aggregate\if applicable):</p> <ul style="list-style-type: none"> – Kind/type of security; – Issuer; – ISIN code; – Nominal value; – Volume; – Nominal value of the volume; – Market value; – Other
Conditions under which it is necessary to obtain permission from the Government Commission / Bank of Russia	<p>If:</p> <ul style="list-style-type: none"> a. such securities acquired after 03/01/2022 from persons of unfriendly foreign states¹ and; b. credited to the depo account (personal account) of the owner with:

¹ clause 12 Decree of the President of the Russian Federation № 138 dated on 03.03.2023: Persons of unfriendly foreign states are understood to mean foreign persons associated with foreign states that commit unfriendly actions against the Russian Federation, Russian legal entities and individuals (including if such foreign persons have the citizenship of these states, the place of their registration, the place of their primary conduct of economic activities or the place of their primary profit from their activities are these states), and persons who are under the control of these foreign entities, regardless of their place of registration (except for cases where their place of registration is the Russian Federation) or the place of their primary business activity.»

	<ul style="list-style-type: none"> – personal account of a foreign organization that is a registrar in accordance with its personal law (i.e. from the account of a foreign registrar); – from a depo account/separate account of a foreign nominal holder opened with a russian depository/register of securities holders; – from a depo account of depository programs opened with a russian depository; – from a depo account of a foreign authorized holder opened with a russian depository; – from the depo account/ separate account of the owner/foreign authorized holder opened by a foreign organization in the Russian depository/register of securities owners (this bulletin applies only to securities, the possession of which or any legal and actual actions with which are carried out by a foreign organization in the interests of a third persons on the basis of an agreement concluded between them. <p>Attention! In this paragraph, foreign persons who simultaneously meet the following criteria are excluded from the list of persons of unfriendly foreign states:</p> <ul style="list-style-type: none"> – are under the control of Russian legal entities or individuals (the ultimate beneficiaries are the Russian Federation, Russian legal entities or individuals), including if this control is exercised through foreign legal entities associated with such foreign states and; – information on control over them is disclosed by Russian legal entities or individuals to the tax authorities of the Russian Federation (hereinafter referred to as persons who are not hostile non-residents).
<p>What documents are required to be submitted to the Government Commission (clause 5 of Decree of the Government of the Russian Federation of 06.03.2022 № 295, Decision of the Board of Directors of the Bank of Russia of 03.25.2022)?</p> <p>General set - for resident and non-resident</p>	<ul style="list-style-type: none"> – Application for issuance of a permit (<i>according to the approved form</i>); – An application for issuing a permit for the implementation (execution) of a transaction (operation), containing information on the purpose, subject, content and essential conditions of the transaction (operation), on the planned validity period of such a permit (<i>in any form</i>); – A document confirming the state registration of the applicant - a legal entity or an individual as an individual entrepreneur in accordance with the legislation of the relevant state, or in relation to the applicant - a legal entity another document confirming the fact of its creation; – Copies of documents on the state registration of a legal entity - a non-resident under the laws of the country where this person is established, with information about the

	<p>founders and owners (if the non-resident is already registered), or copies of the draft constituent documents of non-residents (for non-residents who are at the stage of registration);</p> <ul style="list-style-type: none"> – Document proving the identity of the applicant - an individual; – A document confirming the fact of the establishment of the applicant - a foreign organization that is not a legal entity, in accordance with the legislation of the state in which it is established; – Constituent documents of the applicant - a legal entity; – Copies of the contract, agreement (their drafts), disclosing the essential terms of the operation (transaction), the content of the operation (transaction); – A document containing information about beneficiaries, beneficial owners, a person exercising control over a person of a foreign state that is a party to the transaction (participating in the transaction), committing unfriendly actions, or a person associated with a foreign state, committing unfriendly actions, and about the signs of such a person being located under control; – A document confirming the market value of the subject of the transaction (operation), determined by an independent appraiser (if any) (attached with the appraisal report to the application) (in order to comply with the provisions of Decree № 81, the Ministry of Finance of Russia has given a list of appraisers (appraisal organizations) recommended for assessing the market value of assets).
What documents are required for a non-resident?	<ul style="list-style-type: none"> – Copies of documents on the state registration of a legal entity - a non-resident under the laws of the country where this person is established, with information about the founders and owners (if the non-resident is already registered), or copies of the draft constituent documents of non-residents (for non-residents who are at the stage of registration); – A document confirming the fact of the establishment of the applicant - a foreign organization that is not a legal entity, in accordance with the legislation of the state in which it is established; – A document containing information about beneficiaries, beneficial owners, a person exercising control over a person of a foreign state that is a party to the transaction (participating in the transaction), committing unfriendly actions, or a person associated

	with a foreign state, committing unfriendly actions, and about the signs of such a person being located under control;
<p>What information about a non-resident is required to be reflected in the Application for a permit?</p> <p>(data are generated from the form of Appendix 3 of the Decision of the Board of Directors of the Bank of Russia dated on 25/03/2022 and the form of the government commission approved on 27/04/2023)</p>	<ul style="list-style-type: none"> – Name\country – Registration information (registration number, etc.); – Country of tax residency; – Information about shareholders/founders/beneficiaries; – Phone number; – Contact persons; – Amount of authorized\share capital; – Scope of activity; – The presence of third parties related to the transaction (operation).