

Appendix 1
to resolution of Compliance Committee
of Sberbank of Russia
№11 §3 dated December 25, 2014

Criteria of putting customers of Sberbank of Russia (hereinafter the Bank) into the category of foreign taxpayers and means of collecting information for the purposes of compliance with Federal Law 173-FZ dated 28.06.2014

1. Criteria of putting individual customers into the category of foreign taxpayers:
 - 1.1. Individual customer is a citizen of the USA;
 - 1.2. Individual customer has a permanent stay permit (residence permit) in the USA (e.g., a U.S. permanent resident card, Form I-551, Green Card);
 - 1.3. Individual customer meets the criteria of a significant presence in the USA, i.e. the client has stayed in the territory of the USA at least for a time period established by the U.S. law to recognize such customer as a taxpayer – a tax resident of the USA;
 - 1.4. Individual client refuses to provide information and/or documents required to classify the client as a foreign taxpayer.
2. The Bank cannot classify the individual customer as a foreign taxpayer, if the client is a citizen of the Russian Federation and does not have at the same time a second citizenship in a foreign country (except citizenship of the member country of the Customs Union) or a residence permit in a foreign country (a permanent stay permit in a foreign country).
3. Criteria of putting corporate customers and credit organizations into the category of foreign taxpayers:
 - 3.1. The country of the client's registration / incorporation is the USA;
 - 3.2. Substantial owners of the corporate customer are individuals that are recognized as foreign taxpayers based on the criteria outlined in clause 1 of this Appendix and foreign corporate entities that meet the criteria outlined in clauses 3.1 – 3.1 or 3.4;
 - 3.3. Corporate customer is a foreign financial institution;
 - 3.4. Corporate customer refuses to provide information and/or documents required to classify the customer as a foreign taxpayer;
4. The Bank cannot classify the corporate customer as a foreign taxpayer, if such customer is established in accordance with the legislation of the Russian Federation, more than 90% of shares (interests) in the statutory capital of which are controlled, directly or indirectly, by the Russian Federation and (or) citizens of the Russian Federation, including those having the citizenship of the Russian Federation and the citizenship of member states of the Customs Union and not having the citizenship of any foreign state (other than that of a member state of the Customs Union) or resident permit in any foreign state.

Means of collecting information

The Bank collects information that allows to identify customers recognized as foreign taxpayers under the Federal Law 173-FZ: "On Specifics of Carrying Out Financial Transactions with Foreign Citizens and Legal Entities, on amendments to the Code of Administrative Offences and on Abolishment of Certain Legislative Acts of the Russian Federation" dated 28.06.2014 by way of survey, also by including additional items to standard customer questionnaires used to identify customers under AML/TF procedures (hereinafter the Questionnaire).

Information is also collected when customers provides the Bank with documents specified by the Questionnaire depending on answers to the items in the Questionnaire. The Bank reserves the right to seek additional documents from the customer whenever necessary.

The Bank's employees do not provide consultations for customers in the process of filling in the Questionnaire.

Glossary¹

Foreign taxpayers under Federal Law 173-FZ dated 28.06.2014 - persons subject to legislation on taxation of foreign accounts of a foreign state.

Foreign financial institution - any legal entity that is not a legal entity established or set up pursuant to U.S. legislation that performs the following types of activities:

- a custodial institution (which records and holds, as a substantial portion of its business, financial assets for the account of third parties, and the entity's gross income attributable to the accounting and holding of financial assets for the account of third parties and related financial services equals to or exceeds 20% of the entity's gross income during the shorter of:
 - a three-year period that ends on December 31 (or on the last day of a reporting period that does not correspond to the calendar year) and precedes the year, in which the determination is made; or
 - the period during which the entity has been in existence.;
- an entity accepts (attracts as deposits) monetary funds of individuals and legal entities in the ordinary course of a banking or similar business;
- an investment entity includes any of the following entities:
 - That carries out, as a main business, one or more types of activity in favor of or on behalf of the customers, such as:
 - trading in money market instruments (checks, bills, certificates of deposit, derivatives, etc.); foreign currency; foreign exchange, interest rate, and index instruments; transferable securities; or commodity futures;
 - trust management of third parties' assets (management companies);
 - otherwise investing, administering, or managing funds, money, or financial assets on behalf of other persons;

for these purposes an entity is deemed to carry out certain activity as its main business, if the gross income attributable to this activity is equal to or exceeds 50% of the entity's entire gross income during the shorter of:

- a three-year period that ends on December 31 (or on the last day of a reporting period that does not correspond to the calendar year) and precedes the year, in which the determination is made; or
- the period during which the entity has been in existence;
- the major part of gross income of an entity is connected with investing, reinvesting, or trading in financial assets, and the entity is managed by another entity that exercises directly or through third persons one of the three above-mentioned types of activities on behalf of the managed entity;
- an entity functions (or holds itself out) as a collective investment vehicle, mutual fund, exchange traded fund, private equity fund, hedge fund, venture capital fund, or any similar investment vehicle established for implementing the strategy of investing, reinvesting, or trading in financial assets;

¹ The Glossary may not be considered an analysis or advice on U.S. taxation.

- an insurance company or a holding company of an insurance company that makes payments under a cash value life insurance contract in the event of death, reaching a specified age, date, or some other event or a life insurance contract with regular insurance payments (rent, annuities);
- a holding company or treasury center that:
 - is part of an expanded affiliated group that includes a financial institution having the right to accept monetary funds from customers, a custodial institution, an insurance company as described in this definition, or an investment company; or
 - is established or used by a collective investment vehicle, mutual fund, exchange traded fund, private equity fund, hedge fund, venture capital fund, or any other similar investment vehicle established for implementing the strategy of investing, reinvesting, or trading in financial assets;
- is recognized as a financial institution under the intergovernmental agreement of the country of business of the legal entity and the U.S. government on implementation of U.S. legislation on taxation of foreign accounts.

Customer – individual or legal entity that signed or signs an agreement with the Bank on provision of financial services and opening an account at the Bank.

AML/TF – anti-money laundering and terrorism financing

Substantial owners – direct or indirect ownership of shares (interests, etc.) of the legal entity (by right of vote or cost) of at least 10%.