



## To correspondent banks and counterparties

*About the activities carried out by Optima Bank OJSC  
in order to comply with sanctions and country restrictions*

We hereby inform you that in order to minimize sanctions and reputational risks, Optima Bank OJSC (hereinafter referred to as the Bank) continuously takes measures to ensure compliance with international sanctions and country restrictions and maintain an effective monitoring system for them.

For this purpose, the Bank does not establish or maintain business relationships with:

- individuals and organizations included in the Consolidated Sanctions List of the UN Security Council;
- individuals and organizations included in the blocking sanctions lists of the United States of America (US), the European Union (EU), and the United Kingdom (UK);
- with organizations controlled by companies or individuals included in the blocking sanctions lists of the US, the EU, and the UK, in which such a person owns 50% or more of the shares/interests, or otherwise exercises control.

In addition, in order to manage the sanctions risk, the Bank conducts a comprehensive preliminary check of potential customers and counterparties before establishing a business relationship and checks existing customers/counterparties before conducting a transaction/operation. The verification data includes the following:

- Identification the purpose of opening an account and the intended nature of account transactions;
- Request of the detailed information about the type of activity;
- Request information about counterparties, countries/territories in which the client conducts/plans to conduct activities in order to exclude the export/re-export of sanctioned goods to/from the country/territories subject to sanctions restrictions;
- Identification of the source of funds received/deposited to the client's account;
- Establishment of accurate information about the product/product/service (including HS codes) to verify the existence of sanctions restrictions/embargoes on the product/service;
- Identification of the manufacturer of the goods/services for which payment is made to exclude the import/export/re-export of the sanctioned goods to/from the country/territory on which the sanctions restrictions apply;
- Identification of the end user of the product/service for which payment is made to exclude the re-export of the sanctioned product to/from the country/territory where the sanctions restrictions apply;
- Obtaining information about the route and method of delivery of the goods, in order to avoid transporting the goods by air/sea and through the territories/countries under sanctions;
- Throughout the entire period of business relations with the client, conducting an analysis of transactions conducted by the client with available information about the content of his activities, financial situation and source of funds.

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If the client refuses to provide the above-mentioned information/documents, the Bank refuses to maintain the transaction or accept the client for service/opening an account.

If there are signs that the client's transaction/activity is aimed to circumventing international sanctions, the Bank:

- Does not establish business relations with the client (refuses to accept for service or open an account);
- Terminates the established business relationship.

The Bank has policies and procedures in place in compliant to international sanctions, as well as training programs on sanctions and restrictions, and provides regular training to the Bank's employees.

**Deputy Chairman of the Management Board, CFO**



**R. Turbatov**

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