

**RULES OF THE INTERNAL CONTROL OF ROSEVROBANK JSCB
WITH THE PURPOSES OF COUNTERACTION OF LEGALIZATION (LAUNDERING)
OF INCOMES, RECEIVED BY CRIMINAL WAY, AND FINANCING OF TERRORISM**

The present Rules of the internal control with the purposes of counteraction of legalization (laundering) of incomes, received by criminal way and financing of terrorism applied in ROSEVROBANK JSCB (further - the Rules), are developed according to the requirements of the Federal law from 07.08.01 № 115-FZ " About counteraction of legalization (laundering) incomes, received by criminal way, and financing of terrorism " (further - Law) in view of the recommendations of Bank of Russia and Federal body of the executive authority on realization of state policy (politics) in the field of the market of valuable papers and financial markets.

The terms and definitions(determinations), used in the present Rules:

AUTHORIZED BODY - federal body of the executive authority, arranging on counteraction legalizations (laundering) of the incomes, received by criminal way, and financing terrorism according to the Law.

THE INTERNAL CONTROL WITH THE PURPOSES OF COUNTERACTION OF LEGALIZATION OF THE INCOMES, RECEIVED BY CRIMINAL WAY - set accepted by the employees ROSEVROBANK JSCB (further - Bank) measures on revealing Operations, being subject to the certain control and other Operations with money resources or other property, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism.

OPERATION - action legal (physical) person c by money resources or other property irrespective of the form and ways of their realization, directed on an establishment, change or termination(discontinuance) of the civil rights connected to it and duties.

"AN UNUSUAL BARGAIN (OPERATION) " - action of the customer, distinguished from the standard practice of fulfilment of Operations (or from principles of standard activity of the customer in Bank), which can testify to possible realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

With the purposes of possible (probable) use received by Bank during realization of the internal control of the information and documents as the proof in criminal, civil and arbitration processes, at fixation of the information and tax of the documents the necessary proving documents should be made out properly, and the copies of the documents are certified when due hereunder.

THE OPERATION WITH MONEY RESOURCES, BEING SUBJECT TO THE CERTAIN CONTROL - Operation with money resources or other property is subject to the certain control, if the sum, on which it(he) is made, is equal either exceeds 600 000 roubles or is

equal to a sum foreign currency, equivalent 600 000 roubles or exceeds her(it), and on the character the given Operation concerns to one of the following kinds of Operations:

1.1 Operation with money resources in the cash form:

- Removal from the account or transfer on the account of the legal person of money resources in the cash form in cases, if it is not caused by character of his(its) economic activity;
- Purchasing or sale of cash foreign currency;
- Purchase by the physical person of valuable papers in cash;
- Reception by the physical person of money resources by the check to bearer, issued by non-resident;
- Exchange of banknotes of one advantage on banknotes of other advantage;
- Entering by the physical person in joint capital of organization of money resources in the cash form;

1.2 Transfer or translation on the account of money resources, granting or the reception of the credit (loan), Operation with valuable papers in case though by one of the parties is the physical or legal person, have accordingly registration, residence or place of a presence (finding) in the state (on territory), which (which) does not participate in international coOperation in sphere of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism, or one of the parties the person, owning the account in bank, registered in the specified state (on the specified territory), is. The list of such states (territories) is defined(determined) in the order, established(installed) by Government of Russian Federation on the basis of the lists, authorized by international organizations, engaging in counteraction of legalization (laundering) of the incomes, received by criminal way, and to financing terrorism, and is subject to publication;

1.3 Operation under the bank accounts (contributions):

- Accommodation of money resources in the contribution (on deposit) with registration of the documents, certifying the contribution (deposit) to bearer;
- Opening the contribution (deposit) for the benefit of the third persons with accommodation in him(it) of money resources in the cash form;
- Translation of money resources abroad on the account (contribution), open on the anonymous owner, and receipt of money resources from abroad from the account (contribution), open on the anonymous owner;
- Transfer of money resources on the account (contribution) or withdrawal of money resources from the account (contribution) legal person, the period of activity of which does not exceed three months from the date of his(its) registration, or transfer of money resources on the account (contribution) or withdrawal of money resources from the account (contribution) legal person in case the Operations under the specified account (contribution) were not made from the moment of his(its) opening;

1.4 Other bargains with a personal estate:

- Premise(room) of valuable papers, precious metals, precious stones, jeweller products from them and breakage of such products or other values in lombard;
- Payment to the physical person of insurance compensation or reception from him(it) of the insurance premium on insurance of life or other kinds of memory insurance and pension maintenance;
- Reception or granting of property under the contract of financial rent (leasing);
- Translations of money resources, carried out некредитными by organizations on a comission of the customer;

- Buying up or sale of precious metals and precious stones, jeweller products from them and breakage of such products;

- Reception of money resources as a payment for participation in game in a lottery, or other games based on risk and payment of money resources as a gain, received from participation in the specified games.

2 Operations with money resources or other property is subject to the certain control outside of dependence on a sum, on which it is made, in case though one of the parties is organization or physical person, concerning which are available received in the order established according to The Law of the item of information about their participation in extremism activity, or legal person, directly or indirectly being in the property or under the control of such organization or person, either physical or legal person, working from a name or on the instruction(indication) of such organization or the person.

The order of definition(determination) and finishing up to the item of information of organizations, carrying out Operations with money resources or other property, list of such organizations and persons is established by Government of Russian Federation.

THE ADDITIONAL STATUSES OF THE DOCUMENTS IN ABC OF BANK - statuses, which are appropriated(given) to the documents in ABC of Bank (Automated Bank System) in connection with realization of functions of the control for legalization (laundering) incomes, received by criminal way, and financing terrorism.

TYPES OF THE ADDITIONAL STATUSES OF THE DOCUMENTS IN ABC OF BANK:

"USUAL" - document, not being subject to the certain control and not relating to the "unusual" bargains. The status "usual" can be appropriated(given) to the document:

- Automatically (if the document does not correspond(meets) to given parameters on a sum, correspondence of the accounts, key phrase in purpose(assignment) of payment, other established parameters);

- Responsible employee after study "suspicious" "or" doubtful " of the document, realization of an established procedure of check and acceptance of the decision about qualification of the document as about not being subject to the certain control.

"SUSPICIOUS" - document, appropriate to given conditions of sample of Operations, being subject to the certain control (on a sum, correspondence of the accounts, key word (phrase) in purpose(assignment) of payment, other conditions). At an insert of the given document in ABC of Bank there is the suspicion concerning отнесения it(him) to Operations, being subject to the certain control. The document with the status "suspicious" is directed to the Responsible employee for realization of an established procedure of check and acceptance of the decision about qualification of the document. The status "suspicious" can be appropriated(given):

- Automatically at fulfilment of Operation, appropriate to given conditions of sample;
- Responsible employee at daily viewing by him(it) of the unusual bargains.

"DOUBTFUL" - document in ABC of Bank on a sum of an equivalent 600 000 roubles or are higher, to formal attributes not relating to the documents, being subject to the certain control. The status "doubtful" is appropriated(given) to all staying documents on a sum 600 000 roubles and above, which in result of sample does not appropriate(not given) the status "suspicious". Is formed

with the purposes of the additional control by the Responsible employee of completeness of formation of the electronic list of the documents, being subject to the certain control.

Is appropriated(given) automatically at fulfilment of Operation.

"PASSED THE CONTROL" - document, checked by the Responsible employee and qualified by them(him,it) as " being subject to the qualified to the certain control being subject the to the certain of the control, and also document on the unusual bargain, concerning which by the Responsible employee the decision on representation of the items of information in Responsible a body is accepted.

The document with the status "passed the control" is directed to the register of the documents on a sending.

The status "passed the control" can be appropriated(given) to the document only by the Responsible employee of Bank.

The document, the past all stages of the control and sent in Territorial department of Bank of Russia (further - THAT CBR) "IS SENT" - .

The status " requires(demands) the analysis " can be appropriated(given) to the document only by the Responsible employee of Bank and testifies about acceptance of the document on the control for realization of a detailed procedure of investigation.

After termination(ending) a procedure of investigation the Responsible employee depending on results of investigation can appropriate(give) to the document the status "usual" (if it(he) will bear(take out) the conclusion that the document is not subject to the certain control) or "passed the control" (if the Responsible employee will bear(take out) the conclusion about отнесении of the document to a category " being subject to the certain control ").

THE ACCOUNT - all kinds of the accounts, opened in the Bank (branch), on which makes Operations, stipulated by the Law.

CUSTOMERS OF ROSEVROBANK JSCB (further - Customers) - legal persons (including Credit organizations), physical persons, businessmen, carrying out свою activity without formation(training) the legal person, have bank счет in ROSEVROBANK JSCB (further - bank Bank or in branch Bank, concluding with Bank the contract of the bank of the contribution (deposita) of , and also making through BANK or his(its) branch other bank Operations and bargains according to the requirements of the legislation.

INTERVIEW of the CUSTOMER - formation of the document, containing the items of information on the customer, his(its) activity, Operations, carried out by the customer, and also other items of information, stipulated by the current legislations and specified in the Applications № 1.1 - 1.4 to the 1.1 1.4 present

GROUP FINANCIAL MONITORING - detached structural division of Bank, ensuring development and realization of rules of the internal control with the purposes of counteraction of legalization of the incomes, received by criminal way, and financing terrorism and programs of their realization.

THE RESPONSIBLE EMPLOYEE of BANK - employee of Group financial monitoring or Responsible employee of branch of Bank, carrying out the internal control with the purposes of

counteraction of legalization (laundering) of the incomes, received by criminal way, and financing terrorism.

1. General provisions.

1.1. The internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism, is a part of system of the internal control of Bank, established according to the requirements of the legislation of Russian Federation in the order, established by Bank of Russia and a Federal body of the executive authority on realization of state policy(politics) in the field of the market of valuable papers and the financial markets.

1.2. Responsible for organization in ROSEVROBANK JSCB (further - the Bank) counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism is the Chairman of Government of Bank.

1.3. With the purposes of realization of counteraction of legalization (laundering) incomes received by criminal way, and financing terrorism in Bank Group financial monitoring (further - Group) is generated.

The group is independent in the activity of other structural divisions and is regulated only by the Chairman of Government of Bank.

The group works on the basis of a rule(situation) about the given structural division, Bank authorized according to the internal documents.

The realization of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism in branches of Bank is assigned to the Responsible employee of branch.

The Responsible employee of branch can combine the activity with realization of other functions, except functions, carried out by a Service of the internal control of Bank and provided that it(he) has not the rights to sign on behalf of Bank payment (settlement) and accounting documents, and also other documents, connected to occurrence of the rights and duties of Bank, their realization and execution(performance), and also визировать such documents (except the documents on questions, relating to the exclusive competence the Responsible of the employee).

By group the control and coordination of actions of the Responsible employees of branches comes true.

1.4. The basic principles of organization of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism are:

- Necessity of preservation of confidentiality of the items of information about the internal documents of Bank;

- Necessity of preservation of confidentiality of the items of information about the accounts and contributions of the customers of Bank, and also items of information on the customers and their Operations;

- Exception вовлечения and partnership of the employees of Bank in realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

- Participation of all employees of Bank irrespective of a position within the framework of their competence of revealing Operations, being subject to the certain control, and other Operations with money resources or other property, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism in activity of the customers of Bank.

1.5. The bank does not inform the customers and other persons on accepted measures of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism;

1.6. The present Rules define(determine) the order of documentary fixation of the necessary information, order of maintenance of confidentiality of the information, requirements to preparation and training of the staff, and also criterion of revealing and attributes of the unusual bargains in view of peculiarities of activity of Bank.

1.7. The present Rules include the programs of realization of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

2. Program of realization of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

2.1 The rules include the following programs of realization of the internal control of Bank with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism:

1. Program of identification and study of the customers ROSEVROBANK JSCB;

2. Program of revealing in activity of Bank and his(its) customers of Operations, being subject to the certain control, and other Operations with money resources or other property, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism;

3. Program of check ROSEVROBANK JSCB information on the customer or Operation of the customer for confirmation of validity or refutation of suspicions of realization by the customer of legalization (laundering) incomes, received by criminal way, and financing terrorism;

4. Program of documentary fixation and keeping of the information and documents, received ROSEVROBANK JSCB in result of realization of the programs of realization of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism;

5. Program of training of the employees of Bank on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism;

6. Order of organization in ROSEVROBANK JSCB work on a refusal from the conclusion of the contracts of the bank account (contribution) with the physical and legal persons and refusal in fulfilment of the order of the customer about realization of Operation, and also on stay of Operations with money resources or other property.

7. Program of check (audit) system of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way.

THE PROGRAM OF IDENTIFICATION AND STUDY OF THE CUSTOMERS OF ROSEVROBANK JSCB

The contents:

1. General provisions.
2. Conducting of questionnaire between legal persons of the customers of Bank (Except credit organizations).
3. Conducting of questionnaire of individual customers of Bank.
4. Conducting of questionnaire of the individual businessmen - customers of Bank, working without formation(training) of the legal person.
5. Conducting of questionnaire of credit organizations of the customers of Bank.
6. Conducting of questionnaire of the customers, not have in Bank accounts, specified in sections 2-5 of the of the present Program, Operation thus carrying out through Bank and bargain.
7. Order of updating of the items of information, received in result of identification and study of the customers.

1. GENERAL PROVISIONS.

With the purposes of organization both effective system of the internal control and revealing of Operations, which can be связаны with legalization (laundering) incomes, received by criminal way, and financing terrorism by Bank (branch) will be carried out(spent) Conducting of questionnaire of all customers, switching on the persons, addressing in Bank with the purpose of fulfilment of this or that Operation.

The information, received by Bank in a course анкетирования of the customers, is confidential. The access to the specified information is limited according to the legislation of Russian Federation.

2. CONDUCTING OF QUESTIONNAIRE OF THE LEGAL PERSONS - CUSTOMERS OF BANK (EXCEPT CREDIT ORGANIZATIONS).

Conducting of questionnaire of the legal persons - customers of Bank (except credit organizations), have and (or) opening the bank account by the employees of a Department of opening of the accounts of Bank (branch) persons (further - ООС) in a day of receipt of the complete set of the documents of the account necessary for opening under the form, specified in the Application 1.1 to the 1.1 present Program

At filling the Questionnaire for joint-stock companies the information of the appropriate society(community), being subject to disclosure according to the current legislation about joint-stock companies can be used.

Thus the separate columns of the Questionnaire are filled as follows:

- The column " the name of the customer (complete, reduced and firm) " is filled according to the constituent documents of the customer;

- Column " the legal form ", " registration number ", " the date of state registration " are filled according to data of the document on state registration (re-registration) legal person;

- In the column " the place of state registration " is underlined detailed legal address of the customer, specified in the document on state registration of the legal of the person strict with observance of the following order: country, area, region (city, village and etc.), street, house, case, apartment;

- In the column " the address of a site " is underlined address of an actual presence(finding) of the legal person (is filled according to data " Declarations(application) on opening of the account in ROSEVROBANK JSCB with observance about, specified above;

- In the column " the post address " is underlined address, on which with the customer communication(connection) (comes true is filled according to data " Declarations(application) on opening of the account in ROSEVROBANK JSCB with observance of the above-stated order;

- In the column " the codes of the forms of federal state statistical supervision " are specified codes OKPO and OKVED are filled on the basis of given;

- The column " the items of information on the person, opening the account for the legal of the person " is filled only in case of fulfilment of the above-stated actions уполномоченным by the representative of the legal person.

Thus with the purposes of identification of the physical person, allocated the appropriate powers on opening of the account in the order, stipulated by the legislation, on the basis of the document, certifying the person, are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,

Birth date and birth-place,

Place of registration,

Place of stay,

The name, series and number of the document, certifying the person, body, выдавший the document, date of distribution of the document,

INN (at presence);

Data on the visa (for physical лиц-нерезидентов) with the instruction(indication) of a series, number, date of distribution and validity of the visa;

The essential elements of the power of attorney, on the basis of which physical person works;

- The column " a risk level " is filled according to " by Criteria of an estimation of risk of realization by the customer of legalization (laundering) incomes, received by criminal way " (application 2 to the present Program);

- In the column " the date of opening of the account " is underlined date of opening on balance of Bank of the first account investigated of the customer (settlement, current, depositного)

At opening the customer of the several accounts specifies dates of opening of all accounts;

- In the column " the employee, ratifying opening the accounts " is underlined FIRST NAME, MIDDLE INITIAL, LAST NAME. The vice-president of Government of Bank or Manager by branch or additional office of Bank, уполномоченного when due hereunder to authorize for opening of the account;

- In the column " the term KEEPING of the Questionnaire of the customer " is underlined term - 5 years;

- The column " the items of information on the founders, proprietors of property of the legal person, persons, which have the right to give certain for the legal person of the

instruction(indication), or otherwise to define(determine) his(its) decisions " is filled according to data of the constituent documents of the Customer - legal person.

Thus with the purposes of identification and the study of the physical persons - founders and proprietors of property investigated of the Customer - legal person, and also physical persons, influencing to acceptance of the decisions bodies of the legal person on the basis of the document, certifying the person, are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,
Birth date and birth-place,
Place of registration,
Place of stay,

The name, series and number of the document, certifying the person, body, выдавший the document, date of distribution of the document,

INN (at presence);

Data on the visa (is filled for physical лиц-нерезидентов), series, number, term is underlined, on which visa, date of its(her) distribution is given.

With the purposes of identification and the study of the legal persons - founders investigated of the Customer - legal person are found out and are brought in to the Questionnaire following given(data):

The name;
Registration number;
Place of registration;
Place of a presence(finding);
Post address;
INN;
Codes ОКПО and ОКVED.

- The column " the items of information on presence of the license " is filled with the instruction(indication) of number of the license (sanction to realization of a certain(determined) kind of activity), when, whom and on realization of which of a kind of realization gives the specified license (sanction).

At filling the given column it is necessary to give attention to the licenses, given out by specialized by bodies (to the licenses for the right of realization of professional activity in the market of valuable papers, insurance, tourist activity and etc.);

- The column " the items of information on bodies of management " is filled according to the constituent documents of the Customer - legal person.

With the purposes of study and the identification of the physical persons, included in structure of the executive of bodies investigated of the Customer on the basis of the document, certifying the person, are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,
Birth date and birth-place,
Place of registration,
Place of stay,

The name, series and number of the document, certifying the person, body, выдавший the document, date of distribution of the document,

INN (at presence);

Data on the visa (for individuals-non-residents);

- The column " detached divisions " is filled according to data of the constituent documents investigated of the Customer, and also according to the additional information, given the Customer;

- The column " the basic kinds of activity " is filled according to codes OKVED, specified in the letter of State Statistics Committee, and also according to the additional information, given the Customer;

- The column " the items of information on the constant contractors " is filled on the basis of the additional items of information, given the Customer, and quarterly is updated by results of the automated analysis of commercial payments / receipts of the customer, if quantity(amount) of the specified Operations exceeds 10 in a past quarter;

- The column " a history, reputation, sector of the market and competition " is filled on the basis of the additional items of information, given the Customer, as at opening the account, and by the subsequent granting by the Customer of the items of information about reorganization, changes in character of activity and etc.. Can be supplemented by results of the automated analysis;

- Column of "Operation" and " the sources of receipt of money resources " are filled by results of the quarterly automated analysis and classification of Operations, spent on the account in the following cut(section):

Cash Operations of receipt in national currency;

Non-cash Operations of receipt in national currency;

Operations of receipt in foreign currency.

The column of "Operation" is filled by results of automated sample of Operations under the debit of all accounts of investigated customer in the correspondence with appropriate balance by the accounts;

The column " sources of receipt of money resources " is filled by results of sample of Operations under the credit of all accounts of the customer in the correspondence with appropriate balance accounts;

The column " the characteristic of Operations " is automatically filled as follows:

" the Operations of the customer, in basic, correspond(meet) to character of his(its) economic activity.

The risk of realization by the customer of legalization (laundering) incomes, received by criminal way, and financing terrorism, is _____ (is filled is equivalent to the column " a risk level ").

In too time on the given customer ____ of Operations are recognized connected with possible(probable) legalization (laundering) incomes, received by criminal way and financing terrorism ".

(Filling the specified column comes true automatically at выгрузке appropriate passed the controlных of the documents in a DBF-file and periodically (the once in a quarter) is supervised by the Responsible employee);

The filled Questionnaire is assured by the signature of responsible employee of OOC of Bank (branch or additional office).

In case the Customer - legal person has concluded with Bank only contract of the bank contribution (not concluding the contract of the bank account), it(him) Conducting of questionnaire comes true in a day of the conclusion of the contract also under the form of the Application 1.1 employees OOC of Bank (branch or additional office).

3. CONDUCTING OF QUESTIONNAIRE OF THE INDIVIDUALS WHICH ARE CUSTOMER OF THE BANK

Conducting of questionnaire of the physical persons of the customers of Bank comes true by the employees of a Department of service of the physical persons, Management of plastic cards or responsible by the employees OOC of branches or additional offices of Bank in a day of receipt of the complete set of the necessary documents for opening the account under the form, specified in the Application 1.2 to the 1.2 present Program

Thus the separate columns of the Questionnaire are filled as follows:

- In the column " the residence (registration) " is underlined detailed address of the customer, specified in the document, certifying the person, in the following order: страна, area (republic, edge(territory)), region, city, street, house, case, apartment;

- The column " the items of information on the person, opening the account for the physical of the person (bringing in contribution for the benefit of the physical of the person bringing in the contribution is filled only in case of opening the account not самим by the physical person, and his(its) representative.

Thus with the purposes of identification of the physical person, allocated the appropriate powers on opening of the account (entering of the contribution for the benefit of the physical of the person) in the order, stipulated by the legislation, on the basis of the document, certifying the person, are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,

Birth date and birth-place,

Place of registration,

Place of stay,

The name, series and number of the document, certifying the person, body, выдавший the document, date of distribution of the document,

INN (at presence);

Data on the visa (for physical лиц-нерезидентов) with the instruction(indication) of a series, number, date of distribution and validity of the visa;

The essential elements of the power of attorney, on the basis of which physical person works;

- The column " the items of information on the entrance visa " is filled for the persons, not being the citizens РФ with the instruction(indication) of a series, number, date of distribution and validity of the visa (if by the international contracts РФ is not stipulated безвизовый entrance on territory РФ);

- The column " a risk level " is filled according to section 2 " of Criteria of an estimation of risk of realization by the customer of legalization (laundering) incomes, received by criminal way " (Приложение 2 to the present Program);

- In the column " the date of opening of the account " is underlined date of opening in Bank of the first account (contribution) of the investigated customer. At opening the customer of the several accounts specifies dates of opening of all accounts.

- In the column " the employee, ratifying opening the accounts " is underlined FIRST NAME, MIDDLE INITIAL, LAST NAME. The vice-president of Government of Bank (Manager by additional office or branch of Bank), Chief Accountant of Bank (his(its) Assistant), Chief Accountant of additional office or branch, responsible for opening of the account and to sign the appropriate contract with the physical person;

- In the column " duration of keeping of the Questionnaire of the customer " is underlined term - 5 years;

- Column of "Operation" and " the sources of receipt of money resources " are filled by results of the quarterly automated analysis and classification of Operations, spent on the account in the following section:

Cash Operations sources in national currency;

Non-cash Operations sources in national currency;

Operations sources in foreign currency;

The column of "Operation" is filled by results of automated sample of Operations under the debit of the account investigated customer in the correspondence with appropriate balance by the accounts;

The column " sources of receipt of money resources " is filled by results of sample of Operations under the credit of the account of the customer in the correspondence with appropriate balance by the accounts.

- The column "characteristic" is automatically filled as follows:

" the Operations of the customer, in basic, correspond(meet) to character of his(its) economic activity.

The risk of realization by the customer of legalization (laundering) incomes, received by criminal way and financing terrorism, is _____ (is filled is equivalent to the column " a risk level ").

In too time on the given customer ____ of Operations are recognized connected with possible(probable) legalization (laundering) incomes, received by criminal way and financing terrorism ".

(Filling the specified column comes true automatically at выгрузке appropriate passed the контрольных of the documents in a DBF-file and periodically (the once in a quarter) is supervised by the Responsible employee);

Filling fields " a place of work " and "post" has recommendational character.

The filled Questionnaire is assured by the signature уполномоченного of the employee of Management of plastic cards, Department of service of the physical persons, OOC of branch or additional office of Bank.

In case the Customer - physical person has concluded with Bank only contract of the bank contribution (not concluding the contract of the bank account), it(him) Conducting of questionnaire comes true in a day of the conclusion of the contract also under the form of the Application 1.2

employees of a Department of service of the physical persons or OOC of branch or additional office of Bank.

4. CONDUCTING OF QUESTIONNAIRE OF THE CUSTOMERS - INDIVIDUAL BUSINESSMEN, WORKING WITHOUT FORMATION(TRAINING) OF THE LEGAL PERSON

Conducting of questionnaire of the individual businessmen, working without formation(training) of the legal person of the customers of Bank comes true by the employees OOC or Department of opening of the accounts of branch or additional office of Bank in a day of receipt of the complete set of the documents of the account necessary for opening under the form, specified in the Application 1.3 to the 1.3 present Program

Thus the separate columns of the Questionnaire are filled as follows:

- In the column " the residence (registration) " is underlined detailed address of the customer, specified in the document, certifying the person, is strict with observance of the following order: country, area, region, city, street, house, case, apartment;

- The column " the items of information on the person, opening the account for the businessman " is filled only in case of opening the account not by the individual businessman, and his(its) representative.

Thus with the purposes of identification of the physical person, allocated the appropriate powers on opening of the account in the order, stipulated by the legislation, on the basis of the document, certifying the person, are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,

Birth date and birth-place,

Place of registration,

Place of stay,

The name, series and number of the document, certifying the person, body, выдавший the document, date of distribution of the document,

INN (at presence);

Data on the visa (for physical лиц-нерезидентов) with the instruction(indication) of a series, number, date of distribution and validity of the visa;

The essential elements of the power of attorney, on the basis of which physical person works;

- The column " the items of information on the entrance visa " is filled for the persons, not being the citizens РФ with the instruction(indication) of a series, number, date of distribution and validity of the visa (if by the international agreements of Russia is not stipulate entrance without a visa);

- In the column " the items of information on the certificate on registration in quality ПБОЮЛ " number of the certificate, date and place of distribution, body, issued of the certificate, term is underlined, on which certificate is given;

- The column " a kind of enterprise activity " is filled on the basis of given the certificates on registration and being available licenses;

- The column " a risk level " is filled according to " by Criteria of an estimation of risk of realization by the customer of legalization (laundering) incomes, received by criminal way " (Приложение 2 to the present Program);

- In the column " the date of opening of the account " is underlined date of opening on balance of Bank of the first account (contribution) investigated of the customer. At opening the customer of the several accounts specifies dates of opening of all accounts

- In the column " the employee, ratifying opening the accounts " is underlined FIRST NAME, MIDDLE INITIAL, LAST NAME. The vice-president of Government of Bank or Manager by branch or additional office of Bank, responsible when due hereunder to authorize for opening of the account;

- In the column " duration of keeping of the Questionnaire of the customer " is underlined term - 5 years;

- Column of "Operation" and " the sources of receipt of money resources " are filled by results of the quarterly automated analysis and classification of Operations, spent on the account in the following cut(section):

Cash Operations of receipt in national currency;

Non-cash Operations of receipt in national currency;

Operations of receipt in foreign currency;

The column of "Operation" is filled by results of automated sample of Operations under the debit of all accounts investigated of the customer in the correspondence with appropriate balance by the accounts;

The column " sources of receipt of money resources " is filled by results of sample of Operations under the credit of all accounts of the customer in the correspondence with appropriate balance by the accounts.

- The column " the characteristic of Operations " is automatically filled as follows:

" the Operations of the customer, in basic, correspond(meet) to character of his(its) economic activity.

The risk of realization by the customer of legalization (laundering) incomes, received by criminal way, and financing terrorism is _____ (is filled is equivalent to the column " a risk level ").

In too time on the given customer ____ of Operations are recognized connected with possible(probable) legalization (laundering) incomes, received by criminal way, and financing terrorism ".

(Filling the specified column occurs automatically at выгрузке appropriate passed the controlных of the documents in a DBF-file and periodically (the once in a quarter) is supervised by the Responsible employee);

The filled Questionnaire is assured by the signature уполномоченного of the employee ООС or уполномоченного of the employee of a Department of opening of the accounts of branch or additional office of Bank.

5. CONDUCTING OF QUESTIONNAIRE OF THE CUSTOMERS - CREDIT ORGANIZATIONS.

At an establishment of the correspondent attitudes(relations) the employees of a Department of the correspondent (further - OKO) or Department of opening of the accounts of branch of Bank find out by a direction of an inquiry (Application 3 to the present Program) correspondent, whether measures on the counteraction of legalization (laundering) incomes, received criminal come true by

him(it) by, and financing terrorism including identification and study by the correspondent of his(its) customers.

The correspondent attitudes(relations) with credit organizations, not carrying out counteraction legalizations (laundering) of the incomes, received by criminal way, and financing terrorism including identification and study by the correspondent of the customers by Bank are not established.

Conducting of questionnaire of credit organizations - customers of Bank comes true OKO or Department of opening of the accounts of branch of Bank in a day of receipt of the complete set of the documents for opening the account under the form, specified in the Application 1.4 to the 1.4 present Program

At filling the Questionnaire for joint-stock banks the information of the quarterly report on valuable papers of the appropriate bank is used, being subject to disclosure according to the current legislation (the specified information is placed on сайт of Bank of Russia www.cbr.ru)

Thus the separate columns of the Questionnaire are filled as follows:

- The column " firm (complete official), abbreviated name of the customer and name in foreign language " (is filled according to the constituent documents of credit organization (abbreviated name and the name in foreign language is filled in case it is stipulated by the constituent documents);

- Column " the legal form ", " registration number ", " the date of state registration " are filled according to data of the document on state registration (re-registration);

- In the column " the place of state registration " is underlined detailed legal address of the correspondent bank, specified in the document on state registration of credit organization is strict with observance of the following order: country, area, city, street, house, case, the apartment (can be used data of the quarterly report on valuable papers);

- The column " a kind of the license on realization of bank Operations " for credit organizations – residents of Russia is filled according to kinds of the bank licenses, specified in chapter 8 of the Instruction of Bank of Russia from 23.07.98 № 75-И;

- In the column " the address of a site " is underlined address of an actual presence(finding) of credit organization (is filled according to data " Declarations(application) on opening of the account in ROSEVROBANK JSCB and data of the report on valuable papers) in the above-stated order;

- In the column " the post address " is underlined address, on which with the customer communication(connection) (comes true is filled according to data " Declarations(application) on opening of the account in ROSEVROBANK JSCB" and data of the report on valuable papers) in the above-stated order;

- The column " bank идентификационный a code " is filled according to data of the Directory BIC RF;

- In the column " the codes of the forms of federal state statistical supervision " are specified codes OKPO and OKVED of credit organization (letters of Goskomstat) are filled on the basis of given;

- The column " a risk level " is filled according to " by Criteria of an estimation of risk of realization by the customer of legalization (laundering) incomes, received by criminal way " (Приложение 2 to the present Program);

- In the column " the date of opening of the account " is underlined date of opening on balance of Bank of the first correspondent account investigated of the customer (rouble or currency) At opening the customer of the several accounts specifies dates of opening of all accounts;

- In the column " the employee, ratifying opening the accounts " is underlined FIRST NAME, MIDDLE INITIAL, LAST NAME. The chairman of Government (Manager by branch) Bank;

- In the column " duration of keeping of the Questionnaire of the customer " is underlined term - 5 years;

- The column " the items of information on the founders, proprietors of property of the legal person, persons, which have the right to give certain for the legal person of the instruction(indication), or otherwise to define(determine) his(its) decisions " is filled according to data of the constituent documents of the correspondent bank and data of the quarterly report on valuable papers.

Thus with the purposes of identification and the study of the physical persons - founders and proprietors of property анкетируемой of credit organization, and also physical persons, influencing to acceptance of the decisions bodies investigated of bank on the basis of the document, certifying the person, are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,

Birth date and birth-place,

Place of registration,

Place of stay,

The name, series and number of the document, certifying the person, body, issued the document, date of distribution of the document,

INN (at presence);

Data on the visa (for individuals-non-residents of Russia with the instruction(indication) of a series, number, date of distribution and validity of the visa.

With the purposes of identification and the study of the legal persons - founders investigated of the Customer - legal person are found out and are brought in to the Questionnaire following given(data):

The name;

Registration number;

Place of registration;

Place of a presence(finding);

Post address;

INN;

Codes OKPO and OKVED.

- The column " the items of information on bodies of management " is filled according to the constituent documents of credit organization and data of the quarterly report on valuable papers investigated of bank.

With the purposes of study and the identification of the physical persons, included in structure of the executive of bodies investigated of the Customer on the basis of the document, certifying the person, and other necessary documents are found out and are brought in to the Questionnaire following personal given(data):

Surname, name, patronymic of the physical person,

Birth date and birth-place,

Place of registration,

Place of stay,

The name, series and number of the document, certifying the person, body, выдавший the document, date of distribution of the document,

INN (at presence);

- The column " detached divisions " is filled according to data of the constituent documents анкетируемой of credit organization, and also according to the additional information, given credit organization and data of the quarterly report on valuable papers;

- The column " the items of information on the basic banks - correspondents of the customer " is filled on the basis of the additional items of information, given credit organization. Is quarterly updated by results of the automated analysis of commercial payments of receipts of credit organization, if quantity(amount) of the specified Operations exceeds 10 in a past quarter;

- The column " a history, reputation, sector of the market and competition " is filled on the basis of the additional items of information, given credit organization, as at opening the account, and by the subsequent granting of the items of information about reorganization, changes in character of activity.

Thus the items of information of official sources (Bankers Almanac) are taken into account;

- Column " Operations, spent on the account " and " sources receipts of money resources " is filled by results of the quarterly automated analysis and classification of Operations, spent on the account in the following cut(section):

Cash Operations of receipt in national currency;

Non-cash Operations of receipt in national currency;

Operations / receipt in foreign currency;

The column " Operations, spent on the account " is filled by results of automated sample of Operations under the debit of the account анкетируемой of credit organization in the correspondence with appropriate balance by the accounts;

The column " sources of receipt of money resources " is filled by results of sample of Operations under the credit of the account of the customer in the correspondence with appropriate balance by the accounts;

- The column " the characteristic of Operations " is automatically filled as follows:

" the Operations of the customer, in basic, correspond(meet) to character of his(its) economic activity.

The risk of realization by credit organization of legalization (laundering) incomes, received by criminal way, and financing terrorism is _____ (is filled is equivalent to the column " a risk level ").

In too time on the given credit organization ____ of Operations are recognized connected with possible(probable) legalization (laundering) incomes, received by criminal way, and financing terrorism ".

(Filling the specified column comes true automatically at выгрузке appropriate passed the controlных of the documents in a DBF-file and periodically (the once in a quarter) is supervised by the Responsible employee);

The filled Questionnaire is assured by the signature уполномоченного of the employee OKO or Department of opening of the accounts of branch of Bank.

6. CONDUCTING OF QUESTIONNAIRE OF THE CUSTOMERS, NOT HAVE IN THE BANK ACCOUNTS, SPECIFIED IN SECTIONS 2-5 OF THE PRESENT PROGRAM, THUS CARRYING OUT THROUGH BANK OPERATIONS AND THE BARGAINS.

6.1 Conducting of questionnaire of the customers, not have accounts, but carrying out Operation through Bank (the branch), comes true by the employees of a Department of cash Operations (cashier OK outside of cash unit).

6.2 Conducting of questionnaire of the customers, not have of other accounts in Bank, except broker, comes true responsible by the employees Бэк-оффиса and Депозитария of Bank in a day of the conclusion of the contract under the forms, specified in the Applications 1.1.-1.4 to the 1.1.-1.4 to the present Program depending on a category of the customer).

Thus the separate columns of the Questionnaire are filled according to the recommendations of sections 2-5 of the present Program.

The filled Questionnaire is assured by the signature Уполномоченного of the employee of Back-office. Conducting of questionnaire of other customers, carrying out through Bank (branch) other Operations and the bargains according to the current legislation, comes true by the employees of other divisions of Bank (branch) under the form of the Applications, established by the present Program.

7. ORDER OF UPDATING OF THE ITEMS OF INFORMATION, RECEIVED AS A RESULT OF IDENTIFICATION AND STUDY OF THE CUSTOMERS OF BANK

7.1. Column of the Questionnaire " Operations, spent on the account ", "contractors" and " the sources of receipt of money resources " are updated automatically by results of the quarterly analysis.

7.2. Updating the other items of information of the Questionnaire will be carried out(spent) by the employees OOC of Bank (branch), Department of service of the physical persons and OKO depending on a risk level according to " by Criteria of an estimation of risk of realization by the customer of legalization (laundering) incomes, received by criminal way " (Application № 2 to the present Program):

- In case the risk of realization by the customer of legalization (laundering) incomes, received by criminal way, is classified as high, in the column " the risk level " is available the appropriate mark, updating of the items of information, received in result of identification and study of the Customer, 1 time in a year comes true.

- In case the risk of realization of legalization (laundering) incomes, is classified as average and in the column " the risk level " is available the appropriate mark, updating of the items of information, received in result of identification and study of the Customer, 1 time in three years comes true.

- The items of information on the customers, carrying out Operations with valuable papers are updated 1 time in a year.

7.3. The questionnaire of the customers, generated in the order, stipulated by the present PROGRAM, are subject хранению in an electronic kind no less than five years from the date of closing by the Customer of the latter from the accounts, open in Bank.

If necessary the questionnaire of the customers can be unpacked by the Responsible employee on the paper carrier.

THE PROGRAM OF REVEALING IN ACTIVITY ROSEVROBANK JSCB AND HIS(ITS) CUSTOMERS OF OPERATIONS, BEING SUBJECT TO THE CERTAIN CONTROL, AND OTHER OPERATIONS WITH MONEY RESOURCES OR OTHER PROPERTY, CONNECTED WITH LEGALIZATION (LAUNDERING) INCOMES, RECEIVED BY CRIMINAL WAY, AND FINANCING TERRORISM.

The contents.

1. Revealing Operations with money resources in the cash form, incomes connected to legalizations, received by criminal way, and financing terrorism.

1.1. Procedure of revealing of cash Operations under the accounts of the legal persons, being subject to the certain control.

1.2. Procedure of revealing of Operations, being subject to the certain control, on accommodation of cash money resources:

- In the contribution (deposit) for the benefit of the third persons,
- In the contribution (deposit), made out to bearer,
- In joint the capital of organizations,
- And as reception by the physical person of cash money resources by the check to bearer, given нерезидентом.

1.3. Procedure of revealing of Operations, being subject to the certain control, on purchasing to sale of cash foreign currency; valuable papers in cash.

1.4. Procedure of revealing of Operations, being subject to the certain control, on an exchange of banknotes of one advantage on banknotes of other advantage.

2. Revealing Operations with money resources in the non-cash form, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism.

2.1. The procedure of revealing of Operations of the legal persons, period of activity of which does not exceed three months from the date of registration (перерегистрации), on transfer or списанию from their accounts of money resources (or first Operations under the account from the moment of his(its) opening) in a sum an equal or exceeding equivalent 600 000 roubles.

2.2 The procedure of revealing of Operations, being subject to the certain control, in case though one of the parties is the physical or legal person, have accordingly registration, residence or place of a presence(finding) in the state (on territory), which (which) does not participate in international coOperation in sphere of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism, or one of the parties the person, owning the account in bank, registered in the specified state (on the specified territory), is.

2.3. Transfer or translation on the account of money resources, granting or the reception of the credit (loan), Operation with valuable papers in case though by one of the parties is экстремистская organization, or physical person, concerning which verdict entering in lawful force of court about a recognition his(its) guilty in fulfilment of a crime экстремистской направленности, or organization, directly or indirectly being in the property or under the control of such organization or person, either physical or legal person, working from a name or on the instruction(indication) of such organization or the person is available.

2.4. Procedure of revealing of Operations, being subject to the certain control, on fulfilment of non-credit organizations of translations of money resources on a commission of the customer.

2.5. Procedure of revealing of separate Operations, being subject to the certain control, under the bank accounts (contributions).

3. Revealing by divisions of Bank (branches) unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.1. Action of the employees of Management of development клиентского of business of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.2. Action of the employees of a Department of opening of the accounts of Bank (branch) on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.3. Action OOC of Bank (branch) and Department of service of the physical persons on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.4. Action of the employees of Management of the interbank attitudes(relations) of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.5. Action of the employees an OPERU (Operational Department of branch) on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.6. Action of the employees of Management of the financial analysis of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.7. Action of the employees of a Department of the currency control of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.8. Action of the employees of Credit management of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.9. Action of the employees of бэк-office and Department of the liabilities of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.10. Action of the employees of Management of plastic cards of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

4. Function of the Responsible employee of Bank (branch).

1. Revealing operations with money resources in the cash form, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism.

1.1. Procedure of revealing of cash Operations under the accounts of the legal persons, being subject to the certain control.

1.1.1. At fulfilment of cash Operation in roubles or foreign currency on removal or transfer of money resources on the account of the customer of the legal person in the size equal, or exceeding an equivalent 600 000 roubles (the introduction of the document in ABC of Bank)

software of Bank comes true automatic sample of the cash documents, being subject to the certain control on the given correspondence of the accounts and a sum of the document.

In result of made sample to the cash document, appropriate to given parameters, attribute "suspicious" is automatically appropriated(given), the simultaneously specified document acts in the electronic list of the documents, which is automatically formed at the Responsible employee and is deduced(removed) on the screen at pressing by him(it) of a key "to update". The list of the documents, being subject to the certain control, contains the following essential elements:

- Date of fulfilment of Operation;
- Number of the document;
- Type of the document;
- Sum of Operation;
- Equivalent of foreign currency;
- Number and name of the accounts, with use of which Operation is accomplished(perfect);
- Code of a kind of Operation (according to the normative certificate(act) of Bank of Russia, regulating the order representations by credit organizations in Responsible a body of the items of information, stipulated by the Federal law " About counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism "
- Status of the control;
- Type of the control;
- Payer;
- Addressee;
- Purpose(assignment) of payment.

(The form of the electronic list is resulted(brought) in the Application № 1 in the present Program).

After automatic sample the Responsible employee on the basis of purpose(assignment) of payment, and also other documentation being available at him(it) and by results of the analysis spent by him(it) of the information about the customer and character of his(its) activity, appropriates(gives) to payment the status "passed the control", if the payment satisfies to the requirements of Operations, being subject to the certain control, or status "usual", if the Operation those is not and is caused by character of activity of the customer.

1.1.2. With the purposes of Operative study and qualification by the Responsible employee of cash Operations on delivery to the customer of Bank of cash money resources by the check for a sum equal, or exceeding 600 000 roubles, Responsible the employee of Management of cash Operations (Department of cash Operations of branch) directs to the Responsible employee of a copy of the checks on the above-stated sum, it is not later 10.00 hours of working day, following for in the afternoon their receipts in Bank. To the above-stated terms copies of other checks, in addition requested by the Responsible employee, are represented also.

1.2. Procedure of revealing of Operations, being subject to the certain control, on accommodation of cash money resources in the contribution (deposit) for the benefit of the third persons, in the contribution (deposit), made out to bearer, in joint the capital of organizations and reception by the physical person of cash money resources by the check to bearer, given нерезидентом.

1.2.1. At fulfilment of cash Operation in roubles or foreign currency on entering money resources into the contribution (deposit) for the benefit of the third persons, or made out to bearer in the size equal, or exceeding an equivalent 600 000 roubles Responsible the employee of a Department of service of the physical persons (OOC of branch) is not later 10.00 hours of working day, following for in the afternoon of fulfilment of Operation, directs the Responsible employee of Bank (branch) the information Message on the form of the Application № 2 to the present Program.

The Responsible employee requests the necessary primary documents and checks the given Operations. By results of check it(he) appropriates(gives) to the document the status - "Passed the control", or "Usual" - if the Operation those is not.

1.2.2. At registration of cash inflow receipt into the contribution for the benefit of the third person of a Department of service of the physical persons (OOC of branch) Bank provide reception and entering into the Questionnaire of the customer - physical person, (made according to " with the Program of identification and study of the customers of Bank ") information on the physical person, making Operation and the physical person, on a comission of which it(she) is accomplished(perfect) and not later than 10.00 hours of working day, following for in the afternoon of fulfilment of Operations, direct the Responsible employee of Bank (branch) the information Message on the form of the Application № 2 to the present Program.

1.2.3. The similar actions are made at fulfilment of Operation on entering cash means on a plastic card for the benefit of the third persons. Thus the employees of Management of cash Operations (Department of cash Operations of branch) provide reception from the physical person, making Operation, items of information for filling the questionnaire under the established form and transfer them in a day of fulfilment of Operation in Management of plastic cards. The employees of Management of plastic cards of Bank provide duly entering of the received information into the Questionnaire of the customer - physical person, (made according to " with the Program of identification and study of the customers of Bank " in the electronic form) information on the physical person, making Operation and the physical person, on a comission of which it(she) is accomplished(perfect), and it is not later 10.00 hours of working day, following for in the afternoon of fulfilment of Operations, direct the Responsible employee the information Message on the form of the Application № 2 to the present Program.

1.2.4. At fulfilment of cash Operation in roubles or foreign currency on entering by the physical person in joint capital of organization of cash money resources in the size, equal or exceeding equivalent 600 000 roubles, at registration приходного of the cash warrant on behalf of the person, bringing in money resources or his(its) lawful representative, employees of Management cash (the Cashier OK outside of cash unit, Department of cash Operations of branch) in a day of fulfilment of Operation provide reception and entering into the Questionnaire of the customer of the information on the above-stated physical persons.

1.2.5. At fulfilment of cash Operation on reception by the physical person of money resources by the check to bearer, given нерезидентом, in the size an equal or exceeding equivalent 600 000 roubles Responsible the employee of Management of cash Operations (the Cashier OK outside of cash unit, Department of cash Operations of branch) is not later 10.00 hours of working day, following for in the afternoon of fulfilment of Operation, directs to the Responsible employee the information Message on the form of the Application № 2 to the present Program.

The Responsible employee requests the necessary primary documents and checks the given Operations. By results of check it(he) appropriates(gives) to the document the status - "Passed the control", or "Usual" - if the Operation those is not.

1.3. Procedure of revealing of Operations, being subject to the certain control, on purchasing / sale of cash foreign currency; valuable papers in cash.

1.3.1. With the purposes of the control for legalization of the incomes at fulfilment by the legal or physical person of Operations on purchasing - sale of cash foreign currency or purchasing by the physical person of valuable papers in cash the employee of Management of cash Operations (the Cashier OK outside of cash unit, Department of cash Operations of branch) in a day of fulfilment of Operation enters the additional information on the physical person and duly reception and entering of the necessary information into the questionnaire of the customer - physical person (see " the Program of identification and study of the customers of Bank "), including provides:

- Date of birth of the physical person;
- Place of stay of the physical person;
- INN (at his(its) presence).

In a case if the total sum of the Register of purchasing (sale) foreign currency for a day, being the basis for entry, is equal or exceeds 600 000 roubles, software ABC of Bank automatic sample under the correspondence of the accounts and sum of the Register of Operations comes true, the thus specified document acts in the electronic list of the documents, being subject to the certain control, which is automatically formed at the Responsible employee and is deduced(removed) on the screen at pressing by him(it) of a key "to update".

The Responsible employee requests in Management of cash Operations (Department of cash Operations of branch), data of the Registers of purchasing (sale) foreign currency and information form. 0406007, at presence of Operation with one physical person, the equal or exceeding equivalent 600 000 roubles, makes actions according to section 4 of the present Program.

1.3.2. At fulfilment by the physical person of Operation on purchase of valuable papers in cash on a sum equal, or exceeding an equivalent 600 000 roubles by software ABC of Bank automatic sample of the documents, being subject to the certain control, under the given correspondence of the accounts and sum of the document, comes true. To the cash document, satisfying conditions of sample, attribute "suspicious" is automatically appropriated(given), the simultaneously specified document acts in the electronic list of the documents, being subject to the certain control, which is automatically formed at the Responsible employee and is deduced(removed) on the screen at pressing by him(it) of a key "to update".

1.3.3. By purchase / sale of money marks of the foreign states as banknotes for certain(determined) money compensation in the non-cash form (банкнотные of the bargain) on a sum equal, or exceeding an equivalent 600 000 roubles by software ABC of Bank automatic sample of the documents, being subject to the certain control, comes true, under the given correspondence of the accounts an attribute "suspicious" is automatically appropriated(given), the simultaneously specified document acts in the electronic list of the documents, being subject to the certain control, which is automatically formed at the Responsible employee and is deduced(removed) on the screen at pressing by him(it) of a key "to update".

The Responsible employee of Bank отслеживаются and checks the given Operations and by results of check it(he) appropriates(gives) the status "Passed the control", or "Usual" - if the Operation those is not

1.4. Procedure of revealing of Operations, being subject to the certain control, on an exchange of banknotes of one advantage on banknotes of other advantage.

1.4.1. At fulfilment of Operation on an exchange of banknotes of one advantage on banknotes of other advantage in a sum equal, or exceeding an equivalent 600 000 roubles, Responsible the employee of Management of cash Operations (Department of cash Operations of branch) is not later 10.00 hours of working day, following for in the afternoon of fulfilment of Operation, directs the Responsible employee of Bank (branch) the information Message on the form of the Application № 2 to the present Program.

With the purposes of the additional control and revealing of the above-stated and other Operations, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, the Responsible employee daily forms the list of all Operations in the size equal, or exceeding an equivalent 600 000 roubles, and analyzes the documents contained in it(him). The order of formation of the list is established by items 5.1 and 5.2 present Programs.

2. Revealing Operations with money resources in the non-cash form, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism.

2.1. The procedure of revealing of Operations of the legal persons, period of activity of which does not exceed three months from the date of registration, on transfer or списанию from their accounts of money resources (or first Operations under the account from the moment of his(its) opening) in a sum an equal or exceeding equivalent 600 000 roubles.

2.1.1. At fulfilment of Operation in roubles or foreign currency on списанию or transfer of money resources from the account of the legal person (including Credit organization), the period of activity of which does not exceed three months from the date of his(its) registration (specified requirement is distributed on Operation of the legal persons, which there were in result of reorganization of the legal person in the form of merge, the divisions of allocation or transformation), in the size equal, or exceeding an equivalent 600 000 roubles by software ABC of Bank automatic sample of the documents, being subject to the certain control on the given correspondence of the accounts and on term from the date of registration, comes true, in result of which to the document result an additional attribute "suspicious", the simultaneously specified document acts in the electronic list of the documents, being subject to the certain control, which is automatically formed at the Responsible employee.

2.1.2. The similar actions are made in case of fulfilment of the first Operation under the account of the customer from the moment of his(its) opening, irrespective of term from the date of registration of the customer as the legal person, term, past from the moment of opening of the account, and also fact of presence of other accounts in Bank (branch) and other credit organizations.

2.2 The procedure of revealing of Operations, being subject to the certain control, in case though one of the parties is the physical or legal person, have accordingly registration, residence or place of a presence (finding) in the state (on territory), which (which) does not participate in international coOperation in sphere of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism, or one of the parties the person, owning the account in bank, registered in the specified state (on the specified territory), is.

The list of such states (territories) is defined(determined) in the order, established(installed) by Government of Russian Federation on the basis of the lists, authorized by international

organizations, engaging in counteraction of legalization (laundering) of the incomes, received by criminal way, and to financing terrorism, and is subject to publication.

2.2.1. At fulfilment of Operation in roubles or foreign currency on списанию or transfer of money resources from the accounts of the legal persons (including Credit organizations) or physical persons, have registration, residence or site in the state (on territory), which (which) does not participate in international coOperation in sphere of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism, or one of the parties the person, owning the account in bank, registered in the specified state (on the specified territory), in the size equal, is, or exceeding an equivalent 600 000 roubles, the software ABC of Bank automatically form the list of all documents, being subject to the control, which is automatically formed at the Responsible employee. The Responsible employee, by receiving the specified information, requests at уполномоченного of the employee of Centre of processing of the information (INFORMATION HANDLING CENTRE) (Operating department of branch) Bank the necessary primary documents for an establishment of a fitting of the document to Operations, being subject to the certain control.

The Responsible employee according to the lists of the above described persons and organizations, and also other published information and received primary documents, and also spent analysis, appropriates(gives) to the documents the status or "Passed the control", or "Usual".

2.3. Transfer or translation on the account of money resources, granting or the reception of the credit (loan), Operation with valuable papers in case though by one of the parties is экстремистская organization, or physical person, concerning which verdict entering in lawful force of court about a recognition his(its) guilty in fulfilment of a crime экстремистской направленности, or organization, directly or indirectly being in the property or under the control of such organization or person, either physical or legal person, working from a name or on the instruction(indication) of such organization or the person is available.

The order of definition(determination) and finishing up to the item of information of the list of such organizations and persons is established by Government of Russian Federation.

2.3.1. At fulfilment of Operation in roubles or foreign currency on списанию or transfer of money resources from the account of the customer of Bank - physical person, concerning which verdict of court about a recognition his(its) guilty in fulfilment of a crime экстремистской направленности has entered in lawful force, or organization, directly or indirectly being in the property or under the control of such organizations or person, either physical or legal person, working from a name or on the instruction(indication) of such organizations or the person, at realization of financial Operations, or at fulfilment of Operation in roubles or foreign currency on granting by Bank of the credit стороннему to the legal or physical person (not have the accounts in Bank) or Operation with valuable papers with сторонним by the physical person, concerning which verdict entering in lawful force of court about a recognition his(its) guilty in fulfilment of a crime экстремистской направленности, or organization is available, Directly or indirectly being in the property or under the control of such organization or person, either physical or the legal person, working from a name or on the instruction(indication) of such organization or the person, in the size equal, or exceeding an equivalent 600 000 roubles, software ABC of Bank is automatically formed the list of all расчетно-payment documents, being subject to the control, which is automatically formed at the Responsible employee and is deduced(removed) on the screen at pressing a key "to update". The Responsible employee, by receiving the specified information, requests at уполномоченного of the employee INFORMATION HANDLING CENTRE (operating department of branch) Bank the necessary primary documents for an establishment of a fitting of the document to Operations, being subject to the control. The Responsible employee according to the lists of the above described persons and organizations, and also other published information and

received primary documents, and also spent analysis, appropriates(gives) to the documents the status or "Passed the control", or "Usual".

2.4. Procedure of revealing of Operations, being subject to the certain control, on fulfilment некредитными by organizations of translations of money resources on a comission of the customer.

2.4.1. At fulfilment of Operation in roubles or foreign currency on списанию or transfer of money resources from the account of the legal or physical person in the size equal, or exceeding an equivalent 600 000 roubles on a comission of the third persons (including not being the customers of Bank), software ABC of Bank automatic sample of the documents, being subject to the certain control on the given correspondence of the accounts, sum of the document and key word " For E. ", " For the benefit Of " or " Under the letter " in purpose(assignment) of payment. In result of sample to the document, appropriate to given parameters, status "Suspicious" is automatically appropriated(given), the simultaneously specified document acts in the electronic list of the documents, being subject to the certain control, which is automatically formed at the Responsible employee.

By the Responsible employee additional observation and revealing of Operations on списанию or transfer on the accounts of the customers of money resources in interests of the third persons independently comes true. To the certain control, in particular(personally), can be subject the Operations of the customers, made on the basis of the contracts of a comission (ст. 971 OF CIVIL CODE OF RUSSIA), agency contracts, in case the payment comes true from a name and at the expense of the third person (ст. 1005 OF CIVIL CODE OF RUSSIA), other bargains, accomplished(perfect) by one person on behalf of other person at realization of representation (ст. 182 OF CIVIL CODE OF RUSSIA). To the revealed payment documents on Operations, being subject to the certain control, the Responsible employee appropriates(given) the status "Passed the control".

2.5. Procedure of revealing of Operations on translation of money resources adroad on the account (contribution), open on the anonymous owner, and receipt of money resources from abroad from the account (contribution), open on the anonymous owner.

2.5.1. The responsible employee of a Department SWIFT/TELEX informs the Responsible employee of Bank (branch) under the form of the Application № 2 to the present Program on formation of the electronic document of a format SWIFT/TELE X About translation by the customer of Bank of money resources (irrespective of a sum of translation) on anonymous (number) account (in the contribution) adroad and receipt of money resources with anonymous (number) account (contribution) from abroad on the account of the customer of Bank. The specified message (with the application of copies of the documents of a format SWIFT on the paper carrier) is not later 10.00 hours of working day, following for in the afternoon formations of the document, is directed to the Responsible employee of Bank (branch) for identification of the document in ABC of Bank and realization of an established procedure of investigation.

2.6. Procedure of revealing of separate Operations, being subject to the certain control.

2.6.1. At fulfilment of Operations in roubles or foreign currency on a sum, equal or exceeding equivalent 600 000 roubles on transfer on the account of the physical person of insurance compensation or reception from him(it) of the insurance premium on insurance of life and other kinds of memory insurance and pension maintenance the employees an OPERU FL (Operating

department of branch) and Managements of plastic cards direct to the Responsible employee not later than 10.00 hours of working day, following for in the afternoon of fulfilment of Operation the Register on вкладным to Operations on the forms of the Application № 2 to the 2 present Programs

With the purposes of the additional control and revealing of the following Operations, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way:

- On reception or granting of property under the contract of financial rent (leasing);
- On a premise(room) of valuable papers, precious metals, precious stones, jeweller products from them and breakage of such products or other values in ломбард;
- On buying up, purchase-and-sale of precious metals and precious stones, jeweller products from them and breakage of such products;
- On reception of money resources as a payment for participation in game in a lottery or other games based on risk and payment of money resources as a gain, received from participation in the specified games;
- Other Operations, which according to the requirements of the legislation РФ can be considered(examined) as Operations, being subject to the certain control,

The Responsible employee daily forms the list of all Operations in the size equal, or exceeding an equivalent 600 000 roubles, and analyzes the documents contained in it(him).

The list resulted(brought) in the present Program of Operations, being subject to the certain control, is not settling(exhausting). With the purposes of completeness of revealing of all Operations being subject to the control the Responsible employee makes actions stipulated by items 4.1 and 4.2 present Programs.

3. Revealing by divisions of Bank (branches) unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

General(common) attributes, showing of possible(probable) realization by the customer of Bank of actions on legalization (laundering) of the incomes, received by criminal way, and financing terrorism are:

Unmotivated refusal in granting by the customer of the items of information, not stipulated by the legislation RUSSIAN Federation, but required according to usual bank practice, and also excessive concern of the customer by questions of confidentiality concerning carried out Operation;

Пренебрежение by the customer of more favourable conditions of rendering of services (tariff of a commission, rate for the urgent contributions (depositam) and contributions (depositam) poste restante and etc.), and also offer by the customer of a unusually high commission or commission, obviously distinguished from a usually raised commission at such rendering of services;

The Operations of the customer have not obvious economic sense, do not correspond(meet) to character of activity of the customer and have not by the purpose management ликвидностью or insurance of risks;

Presence non-standard or unusually complex(difficult) instructions on the order of realization of accounts, distinguished from usual practice, used by the given customer, or from usual market practice;

Unreasonable поспешность in realization of Operation, on which customer insists;

Entering by the customer in the earlier coordinated circuit of Operation (bargain) directly before the beginning of its(her) realization of significant changes, especially, concerning direction of a movement of money resources or other property;

The transfer by the customer of a commission about realization of Operation through the representative (intermediary), if the representative (intermediary) carries out a commission of the customer without the introduction in direct (personal) contact to credit organization;

Obvious discrepancy of Operations, spent by the customer, standard market practice of fulfilment of Operations;

Transfer on the account of the customer on one basis from one or several contractors of sums of money resources, not exceeding on separateness a sum, equivalent 600 000 roubles, but in result of addition (if the money resources were enlisted on the basis of one payment document) exceeding the specified sum (provided that the activity of the customer is not connected to service of the population, tax of certain or voluntary payments) with the subsequent translation of money resources on the account of the customer, open in other credit organization, or use of money resources on purchasing of foreign currency, valuable papers and other высоколиквидных of actives;

Splitting sums of money resources, listed(transferred) by the customer to one or several contractors on one basis, during small period of time, provided that result of addition of listed money resources (if they were listed on the basis of one payment document) exceeds a sum, equivalent 600 000 roubles;

Absence of the information about the customer (legal person, including, credit organization) in the official help editions, and also impossibility to carry out communication(connection) with the customer on the addresses specified by him(it) and telephones;

Absence of the information about the customer at serving (or earlier serving) his(its) credit organizations;

Complexity, arising at Bank at check items of information represented the customers, unjustified delays in granting by the customer of the documents and information, representation the customer of the information, which cannot be checked up or the given check is too expensive;

Impossibility of an establishment of the contractors of the customer;

Absence of obvious communication(connection) between character and sort of activity of the customer with services, for which the customer addresses in Bank.

At detection by the employees of Bank of set forth above attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, Responsible the employee of division of Bank, revealing Operation, directs the Responsible employee of Bank the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason, on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

3.1. Action of the employees of Management of development клиентского of business of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

The employees of Management of development клиентского of business with the purposes of revealing the unusual bargains ежемесячно analyze activity of the customers - legal and physical persons, have the accounts in Bank (branch). At revealing attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, Responsible employee of Management of development of customers' business is not later last working day of a month, in

which unusual bargain is revealed, directs the Responsible employee of Bank (branch) the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason, on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

Attributes of the unusual bargains, showing of possible(probable) realization of legalization (laundering) of the incomes, are:

- Absence of the information about the customer in the official directories, at serving it(him) (or earlier обслуживавших) credit organizations.
- Пренебрежение by the customer of more favourable conditions of rendering of services (tariffs on settlement services, and also offer by the customer of a commission, obviously distinguished from standard at standard of rendering of services).

3.2. Action of the employees of a Department of opening of the accounts of Bank (branch) on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

The employees of a Department of opening of the accounts of Bank (branch) with the purposes of revealing the unusual bargains ежемесячно analyze activity of the customers - legal and physical persons, have the accounts in Bank. At revealing attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, Responsible employee of a Department of opening of the accounts is not later last working day of a month, in which unusual bargain is revealed, direct the Responsible employee of Bank (branch) the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason, on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

Attributes of the unusual bargains, showing of possible(probable) realization of legalization (laundering) of the incomes, are:

- Complexity, arising at realization the Programs of study and identification of the customers according to authorized " by the Plan of measures of bank with the purposes of realization of the requirements of the legislation on counteraction of legalization (laundering) incomes authorized received by criminal way " (unmotivated refusal in granting the items of information, excessive concern by questions of confidentiality, the granting of the information, which is impossible to check up, impossibility of an establishment of the contractors of the customer);
- Impossibility to carry out communication(connection) with the customer on the addresses specified by him(it) and telephones.

3.3. Action of the employees OOC of Bank (branch) and Department of service of the physical persons on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

The employees OOC of Bank (branch) and Department of service of the physical persons with the purposes of revealing the unusual bargains analyze activity of the customers - legal and physical persons, have the contributions in Bank. At revealing attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, Responsible employees of the specified structural divisions of Bank are not later last working day of a month, in which unusual bargain is revealed, directs the Responsible employee of Bank (branch) the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason,

on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

Attributes of the unusual bargains, showing of possible(probable) realization of legalization (laundering) of the incomes, are:

- Presence non-standard or unusually complex(difficult) instructions on the order of realization of accounts, distinguished from standard market practice or practice, usually used by the given customer;

- Unreasonable поспешность in realization of Operation, on which customer insists;

- Complexity, arising at realization the Programs of study and identification of the customers according to authorized " by the Plan of measures of bank with the purposes of realization of the requirements of the legislation on counteraction of legalization (laundering) incomes authorized received by criminal way " (unmotivated refusal in granting the items of information, excessive concern by questions of confidentiality, granting of the information, which it is impossible to check up);

- Hesitating by the customer of more favourable conditions of rendering of services (tariffs for the physical persons, rates for the contributions (depositам)), and also offer by the customer of a commission, obviously distinguished from standard (at standard of rendering of services).

3.4. Action of the employees of Management of the interbank attitudes(relations) (Operating department of branch) on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing of terrorism.

The employees of Management of the interbank attitudes(relations) (Operating department of branch) attitudes(relations) with the purposes of revealing the unusual bargains analyze activity of the customers - credit organizations, have the accounts "люпо" in Bank. At revealing attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, Responsible employee of Management of the interbank attitudes(relations) (operating department of branch) is not later last working day of a month, in which unusual bargain is revealed, directs the Responsible employee of Bank (branch) the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason, on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

Attributes of the unusual bargains, showing of possible(probable) realization of legalization (laundering) of the incomes, are:

- Presence non-standard or unusually complex(difficult) instructions on the order of realization of accounts, distinguished from standard market practice or practice, usually used by a data банком-респондентом;

- Unreasonable hire in realization of Operation insisted by the correspondent bank;

- Involvement by the correspondent banks info the earlier coordinated circuit of Operations (bargain) directly before its(her) beginning of significant changes, concerning to a direction of a movement of means;

- Obvious discrepancy of Operations банка-респондента to the standard practice of fulfilment of Operations;

- Complexity, arising at realization the Programs of study and identification of the customers - of credit organizations according to authorized " by the Plan of measures of bank with the purposes of realization of the requirements of the legislation on counteraction of legalization (laundering) incomes authorized received by criminal way " (unmotivated refusal in granting the

items of information, excessive concern by questions of confidentiality, the granting of the information, which is impossible to check up, impossibility of an establishment of banks of the correspondents);

- Absence of the information about correspondent bank in the official directories (Bankers Almanac - for bank-non-residents), and also impossibility to carry out communication(connection) with correspondent bank on the addresses specified by him(it) and telephones);

- Hesitating by the correspondent bank by more favourable conditions of rendering of services (settlement tariffs, rates for the contributions (deposits), and also offer by him(it) of a commission, obviously distinguished from standard (at standard of rendering of services);

- Translations of money resources from other credit organization (including Bank - нерезидента) on return of the insurance premium on a sum there is less sum, equivalent 600 000 roubles, at preschedule cancellation by the customer of the contract of voluntary insurance.

3.5. Action of the employees an OPERU, OPERU KO, OPERU FL (operating department of branch) on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

Employees OPERU, OPERU KO, OPERU FL (operating department of branch) at revealing attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, are not later last working day of a month, in which unusual bargain is revealed, direct the Responsible employee of Bank (branch) the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason, on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

Attributes of the unusual bargains, showing of possible(probable) realization of legalization (laundering) of the incomes, are:

- Presence non-standard or unusually complex(difficult) instructions on the order of realization of accounts, distinguished from standard market practice or practice, usually used by the given customer; unreasonable поспешность in realization of Operation, on which customer insists;

- Entering by the customer in the earlier coordinated circuit of Operations (bargain) directly before its(her) beginning of significant changes, concerning to a direction of a movement of means;

- Obvious discrepancy of Operations, spent by the customer, character of activity of the customer;

- Complexity, arising at realization the Programs of study and identification of the customers according to authorized " by the Plan of measures of bank with the purposes of realization of the requirements of the legislation on counteraction of legalization (laundering) incomes authorized received by criminal way " (unmotivated refusal in granting the items of information, excessive concern by questions of confidentiality, the granting of the information, which is impossible to check up, impossibility of an establishment of the contractors of the customer);

- Impossibility to carry out with the customer communication(connection) on the addresses specified by him(it) and telephones (in process(!during) операционно-cash work, and also during realization of the control for the налично-money reference(manipulation));

- The transfer by the customer of a comission about realization of Operation through the representative (intermediary), if the representative carries out a comission of the customer without the introduction into direct contact to the employees of Bank (comission is transferred through a user's box).

3.6. Action of the employees of a finance Administration of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

The employees of a finance Administration with the purposes of revealing the unusual bargains analyze activity of the customers - legal and physical persons, have the accounts (the contributions) in Bank (branch). At revealing attributes, showing of possible(probable) realization of legalization (laundering) incomes, received by criminal way, Responsible employee of a finance Administration is not later last working day of a month, in which unusual bargain is revealed, directs to the Responsible employee of Bank the Message on fulfilment of the unusual bargain (Operation), its(her) contents and reason, on which this bargain is qualified as unusual (Application № 3 to the present Program) for realization of a procedure of investigation.

Attributes of the unusual bargains, showing of possible(probable) realization of legalization (laundering) of the incomes, are:

- Not connected directly with usual activity of the customer unexpected essential increase сальдо on the account during an Operating day (by results of the preliminary analysis to establish percentage, being an attribute of essential of increase сальдо, presumably, more than in 5 times), more than 60 % of which subsequently during 2-th days is translated on his(its) account in other bank or is used for the purposes of purchasing of foreign currency (with translation for the benefit of нерезидента);

- Essential increase of a share of cash money resources, acting on the account of the customer - of the legal person during a calendar of a month (by results of the preliminary of the analysis to establish a percentage parity(ratio), being an attribute of essential increase сальдо, presumably, in 2 times), if usual for activity of the customer are the clearing settlements;

- Irregular (or unitary) use by the customer of the account for reception of money resources and the subsequent their removal in the cash form on a sum is less than sum, equivalent 600 000 roubles, with the subsequent closing of the account or termination(discontinuance) on it(him) Operations;

- Transfer of money resources on the account of the customer - legal person, Operation on which more than 6 months (were not carried out(spent) or were extremely insignificant) with the subsequent removal by the customer of cash money resources;

- Transfer on the account of the customer (the activity of which is not connected to service of the population or tax of payments) during one working day from one or several contractors of sums of money resources in result of addition exceeding an equivalent 600 000 roubles with the subsequent translation of means on his(its) account, open in the other bank or use of money resources on purchase of foreign currency, valuable papers or other высоколиквидных of actives;

- Transfer by the customer of money sums on the identical basis to one or several contractors during small period (by results of the preliminary analysis to establish duration of period of time, presumably 1 day), provided that the result of addition of listed means exceeds an equivalent 600 000 roubles;

- Transfer on the account of the customer of significant quantity(amount) of money resources (by results of the preliminary analysis to establish volume or quantity(amount) of payments) from the physical persons on a sum, not exceeding an equivalent 600 000 roubles (including Cash), if the activity of the customer is not connected to rendering of services to the population, tax of payments;

- Regular (more once during two operating days) transfer on the account of one customer of money resources in the cash form in result of sale or collection by Bank of the checks, issued by international payment system, supposing subsequent акцепт with translation of whole or greater

part of a sum on the account of the customer in other credit organization, or for the benefit of the third person (including non-residents);

- Opening during small period of time addressed to one customer several urgent depositных of the accounts on a sum, smaller, than equivalent 600 000 roubles, with the subsequent transfer of sums on expiration of terms of the contributions (deposits) on one account and (or) subsequent translation in other credit organization;

- Translation of money resources from the account of the customer - legal person on his(its) account in other credit organization without the visible basis (without closing the account, not with the purposes of repayment of the credit, at the equal or lower rates for the contributions either equal or worse conditions of service in other credit organization) with purpose(assignment) of payment " translation of own means ").

3.7. Action of the employees of a Department of the currency control of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

3.7.1. Responsible employee of a Department of the currency control of Currency Management of Bank with the purposes of revealing the unusual bargains carries out control and not later last working day of a month, in which unusual bargain is revealed, informs the Responsible employee of Bank under the form of the Application № 3 to the present Program on fulfilment of the following unusual bargains (Operations):

- Return by non-resident of earlier paid advance payment нерезиденту (irrespective of a sum of Operation) under the contract of delivery of the goods, work, services in cases, when the Operation between resident an non-resident has single character (does not repeat during 6 months) and (or) is not connected to his(its) basic activity (section " the Basic kinds of activity " in the Questionnaire of the customer - legal person);

- Payment by resident to non-resident of the penalty for default of the contract of delivery of the goods (work, services) or for infringement of conditions of the contract, if the size of penalty exceeds 10 % from a sum of the not put goods (work, services);

- Use by the customer of the international forms of accounts, not appropriate to character of activity of the customer;

- Addressee of money resources (goods, work, services, results of intelligent activity) is нерезидент, not being the party under the contract (contract), providing import (export) резидентом of the goods (work, services, results of intelligent activity);

- In the contract (contract) where the resident exports the goods (work, services, results of intelligent activity) or payments on import for the benefit of non-resident, registered in the states and on territories, giving preferential tax mode and (or) not providing раскрытие and granting of the information is stipulated at realization of financial Operations (offshore zone);

- Registration on the different names of commodity positions товарораспорядительных of the documents, GTD and external economic contracts (contracts), on which in Bank the passports of the bargains are made out, or товарораспорядительные the documents do not contain precise, with the reference on TN VED of the description of the goods, being a subject of the external economic contracts;

- At realization of payments under the credit contracts (contracts of the loan) borrowers - резидентов for the benefit of the creditors нерезидентов, in aggregate exceeding in a year 30 % from the basic sum of the credit (loan);

- Regular representation of the checks, issued by the non-residential bank and indorsed by non-resident, for collection;
- Presence non-standard or unusually complex(difficult) instructions on the order of realization of accounts, distinguished from standard market practice or practice, usually used by the given customer;
- Realization of the customers of regular remittances, being repayment сальдо of accounts on взаимозачету (except for participation of the customer in the interstate or intergovernmental clearing agreements and Operations of offset of the mutual requirements between credit organizations) on data items of information, contained in a declaration(application) on the translation;
- Unreasonable hurry in realization of Operation, on which customer insists;
- Entering by the customer in the earlier coordinated circuit of Operations (bargain) directly before its(her) beginning of significant changes, concerning to a direction of a movement of means;

3.7.2. Responsible employee of a department SWIFT/TELEX of Bank informs the Responsible employee of Bank under the form of the Application № 2 to the present Program) on formation of the electronic document of a format SWIFT/TELEX About translation by the customer of Bank of money resources (irrespective of a sum of translation) on anonymous (number) account (in the contribution) abroad and receipt of money resources with anonymous (number) account (contribution) from abroad on the account of the customer of Bank. The specified message (with the application of copies of the documents of a format SWIFT on the paper carrier) is not later 10.00 hours of working day, following for in the afternoon formations of the document, is directed to the Responsible employee of Bank for identification of the document in ABC of Bank and realization of an established procedure of investigation.

The Responsible employee of Bank checks the given Operations, and by results of check it(he) appropriates(gives) the status - "Passed the control", or "Usual".

3.8. Action of the employees of Credit management (Department кредитования of branch) Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

Responsible employees of Credit management (Department кредитования branch) with the purposes of revealing the unusual bargains carry out control and not later last working day of a month, in which unusual bargain is revealed, inform the Responsible employee of Bank (branch) under the form of the Application № 3 to the present Program on fulfilment of the following unusual bargains (Operations):

- The granting by Bank of the credit, maintenance of execution(performance) of the obligations on return of which, is accommodation of money resources on the account in Bank or other credit organization (in currency of the credit, other currency) or valuable papers to bearer;
- The granting by Bank of the credit, maintenance of execution(performance) of the obligations, on return of which is a guarantee банка-нерезидента on a sum, making an integer (100 thousands, 1 million and etc.), under condition of absence of obvious communication(connection) between a place of activity of the borrower and guarantor, especially, if the guarantee is given out by branch of non-resident bank;
- Repayment of delayed debts under the credit contract, if conditions of activity of the customer and the information, which concerning the given customer Bank has, does not allow to define(determine) a source of financing of debts;

- Receipt in repayment of the credit of money resources from unknown sources of repayment or sources, неупомянутых by the customer;
- Granting the credit with the interest rate, essentially exceeding the average interest rate on the credits on a home market of credit resources;
- Granting the credit to the borrower, information about which, stated in a declaration(application) for granting the credit, does not correspond(meets) the informations and documents, received during negotiations from the representatives of the customer;
- Granting the credit under a pledge of precious stones, imported on territory of Russia.

3.9. Action of the employees of бэк-office and Department of the liabilities of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

Responsible employees of бэк-office and Department of the liabilities of Bank with the purposes of revealing the unusual bargains carry out control and not later last working day of a month, in which unusual bargain is revealed, inform the Responsible employee of Bank (under the form of the Application № 3 to the present Program) on fulfilment of the following unusual bargains (Operations) on own and broker Operations of Bank with valuable papers and derivative financial tools.

Attributes of unusual Operations, showing of possible(probable) realization by the customer of legalization (laundering) of the incomes, are:

- Confusing or unusual character of the bargain, not have of obvious economic sense or the obvious lawful purpose;
- Discrepancy of the bargain to the purposes of activity of organization, established by the constituent documents of this organization;
- Revealing numerous fulfilment of Operations or bargains, the character of which gives the basis to believe, that the purpose of their realization is evasion from procedures of the certain control, stipulated by the Law;
- Absence or impossibility of check in the standard order of the information about the customer and - or the constituent him(it) constituent and other documents and items of information and - or impossibility of realization of communication(connection) with the customer on the addresses specified by him(it) and telephones;
- Realization of Operation in cash;
- Obvious hurry in realization of Operation by the customer;
- Hesitation by the customer of more favourable conditions of execution(performance) of his(its) commissions (tariff of a commission, existing price(!at the price of) of purchasing / sale of financial tools).

For revealing unusual Operations (bargains) following criteria are used:

- Fulfilment of several Operations on a total sum no less than 600 000 roubles at the expense of brought in by the customer in cash department of Bank lumpsum or in parts of cash money resources in the size, equal or greater 600 000 roubles;

- The fulfilment on the basis of the address applications of the кросс-bargains a minimum of 200 000 roubles each, when by the parties of such bargains (simultaneously both buyer and seller) is Bank or his(its) customers;

- Regular conclusion by the customer of the urgent bargains (or use of other derivative financial tools), not providing delivery of a base active, result of which is the constant income or constant loss of the customer;

- Single purchasing / sale by the customer (not being professional participant of the market of valuable papers) significant package of valuable papers (no less than 300 000 руб.), valuable papers not addressed in the organized market under the prices, more than on 20 % distinguished from market;

- Regular Operations a minimum of 100 000 руб. On purchasing and subsequent sale of valuable papers, not have quotations and valuable papers not addressed in the organized market with a direction of the income from realization of papers on purchase высоколиквидных of valuable papers;

- Simultaneous exhibiting to purchasing and sale of valuable papers (and other financial tools) under the prices, have an appreciable a deviation(rejection) (more of 20 of %) from the current market prices on the similar bargains;

- Fulfilment of the mutual bargains, when the parties of such bargains (Bank or his(its) customers) regularly vary, representing itself of the sellers, of the buyers, getting / . on sale thus lumpsum or in parts the same financial tool about of same volume;

- Realization of Operations with valuable papers to bearer, not placed in депозитариях.

3.10. Action of the employees of Management of plastic cards of Bank on revealing attributes of the unusual bargains, connected to possible(probable) realization of legalization (laundering) incomes, received by criminal way, and financing terrorism.

Responsible employees of Management of plastic cards of Bank with the purposes of revealing the unusual bargains carry out control and not later last working day of a month, in which unusual bargain is revealed, inform the Responsible employee of Bank (under the form of the Application № 3 to the present Program) on fulfilment of the following unusual bargains (Operations):

- Regular transfer by the customer of money resources on a sum there is less equivalent 600 000 roubles, one or several contractors at fulfilment of Operations of purchasing / sale of the goods (work, services) by means of a network Интернет with use of a plastic card;

- The regular transfer by the customer, giving services in sphere of trade by means of Internet, money resources on a sum is less than sum, equivalent 600 000 roubles, acting with the accounts for accounts with use of plastic cards the customers of other credit organizations;

- Regular removal by the holder of a plastic card of cash money resources (more than 3-rd times during a calendar month on a total sum, equal or exceeding 600 000 roubles) through cash department of Bank or банкомат (except for payments by the employer of material compensation by the worker in any form);

- Unreasonable hurry in realization of Operation, on which customer insists;

- Entering by the customer in the earlier coordinated circuit of Operations (bargain) directly before its(her) beginning of significant changes, concerning to a direction of a movement of means;

4. Function of the Responsible employee of Bank (branch) at revealing in activity of Bank and his(its) customers of Operations, being subject to the certain control, and other Operations with money resources or other property, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism.

4.1. Automatically generated electronic list of the documents with an attribute "suspicious", or "doubtful", and also other information from the workers of Bank, acting(arriving) on electronic post(mail) and on the paper carrier about fulfilment of the unusual bargains, are carefully studied and are investigated by the Responsible employee:

- Each document, specified in the electronic list, is considered(examined);
- Correctness of qualification of Operation, being subject to the certain to the control (in disputable situations is checked the decision on qualification of Operation) is accepted;
- Necessary additional information is requested;
- Sufficiency of the essential elements, being available in ABC of Bank, is established, measures to the tax of the additional information are if necessary accepted.

4.2. The Responsible employee daily checks all documents, spent in ABC of Bank during an Operating day, with a sum an equal or exceeding equivalent 600 000 roubles, and also other documents, which is possible to classify as " the unusual bargains ", with the purpose of an establishment of completeness of formation of the list of the documents, being subject to the certain control.

4.3. The Responsible employee requests an information database about the customer - Questionnaire of the customer (with use of the account of which cash Operation) for reception of the following items of information about the legal person is accomplished(perfect), the account of which was used for fulfilment of cash Operation or about the physical person, with use of the account of which Operation is accomplished(perfect):

- Name of the customer (FIRST NAME, MIDDLE INITIAL, LAST NAME - for the physical person);
- Registration number (for the legal persons and physical persons, conducting enterprise activity);
- Place of registration of the customer (residence - for the physical person);
- Place of a presence(finding) of the customer (place of stay - for the physical person);
- Post address;
- Code OKPO (kind, series and number of the document, certifying the person, body, выдавший the document, place of distribution - for the physical person);
- INN (for the physical person at his(its) presence);
- Date of registration of the legal person (birth date and birth-place for the physical person).

4.4. At absence in the Questionnaire of the necessary items of information, Responsible employee necessary measures to their finding - out (are accepted the information at the Chief of a department of opening of the accounts) and entering into the Report is requested.

4.5. By results of spent investigation the Responsible employee of Bank gives to the "suspicious" or "doubtful" document, and also bargain referred уполномоченным by the employee of the appropriate division to a category "unusual", one of the following attributes:

- "Usual" - if by him(it) the decision is accepted, that the "suspicious" document is not subject to the certain control;

- " requires(demands) the analysis " - if for acceptance of the final decision for it(him) is necessary the additional information and (or) documents from other structural divisions of Bank;
- "Passed the control" - if отнесение of Operation to the category being subject to the certain control is confirmed by the Responsible employee.

The documents with an attribute "passed the control" are subject to inclusion in OED for a sending it to the CBR (register of the messages).

4.6. Forms the final Report with use of digital codes Общероссийского of the qualifier of the countries of the world and codes of kinds of Operations according to the requirements of Bank of Russia.

4.7. Transforms it(him) to structure of a DBF-file.

4.8. Carries out actions on transfer of the Report as the electronic document (OED) according to " by Technological process(!during) of transfer - reception and processing OED " in established terms (till 16.00 on local time of working day, following for in the afternoon of fulfilment of Operation, being subject to the certain control, or day of assignment by the Responsible employee to the "unusual" bargain of the status "passed the control").

The program of check of the information about the customer ROSEVROBANK JSCB or Operation of his(its) customer for confirmation of validity or refutation of suspicions of realization by the customer of legalization (laundering) incomes, received by criminal way, and financing terrorism.

With the purposes of realization ROSEVROBANK JSCB (further - the Bank) counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism is established the following procedure of check of the information about the customer or Operation of the customer for confirmation of validity or refutation of suspicions of realization by the customer of legalization (laundering) incomes, received by criminal way, and financing terrorism:

1.1. At occurrence of doubts at qualification of Operation of the customer as of Operation, being subject to the certain control, according to the Law Responsible the employee of structural division of Bank (branch), revealing the specified Operation, in writing notifies the Responsible employee not later than 10.00 following working day for in the afternoon revealings of Operation (bargain).

1.2 The Responsible employee on the basis of the received information from the appropriate structural divisions of Bank (branch), constituent documents of the customer, given questionnaire of the customer and also other additional items of information (business correspondence with the customer) accepts the final decision on a recognition of Operation of the customer by Operation, being subject to the certain control, and representation of the items of information about it(her) in Responsible a body.

1.3. At revealing the unusual bargain and occurrence of doubts in qualification of the bargain the Responsible employee makes a decision on further actions concerning the customer or his(its) bargain, namely:

- To address to the customer with the request for granting necessary an explanation, including, additional items of information, explaining economic sense of the unusual bargain;

- To ensure(supply) raised(increased) attention to all Operations (bargains) customer, spent through BANK (branch), about than employee of structural division of Bank (the branch) is informed Responsible;

- To undertake other actions within the framework of the powers, established by the duty regulations, which the Responsible employee will consider expedient with the purposes of realization of measures on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

THE PROGRAM OF DOCUMENTARY FIXATION AND KEEPING OF THE INFORMATION AND DOCUMENTS, RECEIVED IN RESULT OF REALIZATION OF THE PROGRAMS OF REALIZATION OF THE INTERNAL OF THE CONTROL ROSEVROBANK JSCB WITH THE PURPOSES OF COUNTERACTION OF LEGALIZATION (LAUNDERING) INCOMES, RECEIVED BY CRIMINAL WAY, AND FINANCING TERRORISM AND MAINTENANCE OF CONFIDENTIALITY OF THE SPECIFIED INFORMATION.

1. ORDER of RUNNING the FILE of the RESPONSIBLE EMPLOYEE.

1.1. With the purposes of maintenance of uniform centralized system of fixation and KEEPING of the information, connected to realization of the internal control with the purposes of counteraction of legalization (laundering) of the incomes, received by criminal way, and financing terrorism the Responsible employee of Bank (branch) daily forms on paper carriers " the File of the Responsible employee ", in which following documents are located:

- Message on fulfilment of the unusual bargains (or bargains, being subject to the certain to the control), formed responsible by the employees of various divisions of Bank according to " by the Program of revealing in activity ROSEVROBANK JSCB and his(its) customers of Operations, being subject to the certain control, and other Operations with money resources or other property, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism " with necessary marks of the Responsible executor about the status of the document (unusual bargain) according to " by the Rules of actions of the Responsible employee ";

- Copy of the documents, on the basis of which the Responsible employee forms opinion on qualification of Operation (bargain) as being subject to the certain control, including data on checks of cash discipline, extract under the accounts of the customers in ABC of Bank, other data, given the customers and divisions of Bank to the Responsible employee for realization of the duties;

- Summary memorial warrant on Operations (bargains), being subject to the certain control, for each Operating day, directed in Responsible a body on established channels of communication(connection);

- Notice as the electronic document, confirming acceptance (непринятие) report as the electronic document by territorial establishment of Bank of Russia

- The business correspondence, with the customers of Bank (branch), which was taken into account at acceptance of the decision by the Responsible employee.

1.2 The file of the Responsible employee is formed daily and is subject хранению in the following order:

- During one year - in the safe, sealed up Responsible employee;

- On expiration of a year - is when due hereunder transferred in archive of Bank (branch), where is stored(kept) during 5 years;

- The business correspondence is stored(kept) in archive of Bank during 5 years from the moment of a discharge between Bank and customer.

1.3 The receipts, received from уполномоченного of a body about results of processing deciphered files, directed by Bank (by branch) when due hereunder of , are formed by the Responsible employee in the separate File and are subject хранению during five years.

1.4 Programm and hardware-software means криптографической of protection of the information and the directories are stored(kept) in Bank (branch) in the order, stipulated by internal by Rules(situations) in term not less of 5 years.

2. ORDER KEEPING of the INFORMATION, CONNECTED To REALIZATION of the INTERNAL of the CONTROL ROSEVROBANK JSCB With the purposes Of COUNTERACTION of LEGALIZATION (LAUNDERING) of the INCOMES, RECEIVED BY CRIMINAL WAY, And FINANCING TERRORISM And MAINTENANCE of ITS(HER) CONFIDENTIALITY.

2.1 The information, connected to realization by Bank (by branch) of the internal control with the purposes of counteraction of legalization (laundering) of the incomes, received by criminal way, and financing terrorism is subject хранению and архивированию in an electronic kind in the order, stipulated for ABC of Bank (in term not less of 5 years from the moment of a discharge between Bank and the customer).

To the specified information concern:

- Questionnaire of the customers of bank, formed and updated in the order, stipulated " by the Program of identification and study of the customers of ROSEVROBANK JSCB;

- Summary memorial warrants and other confirming documents on Operations (bargains), being subject to the certain control, for each Operating day, directed in territorial establishments of Bank of Russia on established channels of communication(connection);

- Notice as the electronic document, formed by Bank (branch), confirming reception (refusal in reception) OED by territorial establishment of Bank of Russia;

- Receipts, received from уполномоченного of a body about results расшифрования of a file;

- Item of information on the statuses of the documents (and also history of their change), past procedure of the control according to " by the Program of revealing in activity ROSEVROBANK JSCB and his(its) customers of Operations, being subject to the certain control, and other Operations with money resources or other property, connected with legalization (laundering) incomes, received by criminal way, and financing terrorism ";

2.2. The transfer and reception by Bank of the information in Responsible a body comes true with application of cryptographic protection of the information (further - SKZI): means of formation of codes of authentication (KA).

2.3. Technological process (during) of transfer - reception and processing of the information with use SKZI is regulated and is provided by instructive and methodical materials.

2.4. Each confidential key exists in duplicate: basic and reserve. Direct access to carriers of confidential keys КА and шифрования and exclusive right of their use has only the Responsible employee of Bank (branch), on which given key is registered.

2.5. The carriers of confidential keys КА and шифрования are stored (kept) in the metal safe. The basic key is stored (kept) at the Responsible employee, reserve - in a Department of protection of the information (Service of safety of branch). The keys are stored (kept) in the separate sealed container.

2.6. Upon termination of working day, and also outside of time of formation and transfer - reception of the information the carriers of confidential keys КА and шифрования should be stored (kept) in safes.

2.7. Is not admitted (allowed):

- To remove unauthorized copies from carriers of confidential keys КА and шифрования;
- To acquaint with the contents of carriers of confidential keys КА and шифрования or to transfer carriers of confidential keys КА and шифрования to the persons, to them not admitted (not allowed);
- To deduce (remove) confidential keys КА and шифрования on the display (monitor) computer or printer;
- To establish the carrier of confidential keys КА and шифрования in the reading device (disk drive) АРМ of transfer - reception of the reports as the electronic message (ОЭС) in unforeseen modes of functioning of system of processing and transfer - reception ОЭС (notices as the electronic message), and also in other computers;
- To write down on the carrier of confidential keys КА and шифрования the extraneous information.

2.8. At comprometation of a confidential key КА - event, certain (determined) by the owner of a key КА as acquainting (probable acquainting) неуполномоченным by the person (by the persons) with his (its) by a confidential by a key КА, Bank (branch) any Operations with ОЭС (ИЭС) with use of this key КА stop.,

At once after an establishment of the fact comprometation of a confidential key КА the Bank informs the participants of an exchange on the termination (discontinuance) of use of the given key and not later working day, following for in the afternoon comprometation, Bank (the branch) in writing confirms the fact comprometation.

2.9. At comprometation of a confidential key КА to the participants of an exchange the key КА is deduced (removed) from action and his (its) off-schedule change is made.

2.10. On the fact comprometation of a confidential key КА the Department of protection of the information of Bank will carry out (spent) service investigation, the results of which are reflected in the certificate (act) of service investigation.

2.11. In case of dismissal, translation in other division or on other post, change of functional duties of the employee, have access to carriers of confidential of keys KA, change of keys is made, to which it(he) had access.

2.12. The confidentiality of the information, connected to realization by Bank (by branch) of functions of the internal control with the purposes of counteraction of legalization (laundering) of the incomes, received by criminal way, and financing terrorism is provided by differentiation of the rights of access of the users ABC of Bank according to the internal rules of Bank, and also duty regulations of the employees and other interbank documents, describing rules of exchange and restriction of access to the information.

2.13. The documents, connected to realization by Bank (by branch) of functions of the internal control with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism are stored(kept) in the safe at the Responsible employee.

By work with the given documents the Responsible employee should observe rules of work with the documents, containing the confidential information.

2.14. At information interchange and the documents, connected to realization of functions of the internal control with the purposes of counteraction of legalization (laundering) of the incomes, received by criminal way, and financing terrorism between head office and branch (additional office) Bank should observe the established requirements to maintenance of confidentiality of the information.

2.15 The employees of Bank (branch) are forbidden to inform the customers and other persons on accepted measures of counteraction of legalization (laundering) incomes, received by criminal way, and financing of terrorism.

**THE PROGRAM OF TRAINING OF THE EMPLOYEES ROSEVROBANK JSCB ON
COUNTERACTION OF LEGALIZATION (LAUNDERING) INCOMES, RECEIVED BY
CRIMINAL WAY, AND FINANCING TERRORISM**

1. For maintenance of execution(performance) of the requirements of the legislation of Russian Federation about counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism the employees ROSEVROBANK JSCB (further - Bank) and his(its) branches, in view of their official duties, are trained on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

2. The training will be carried out(spent) by the employees of Group financial monitoring and - or by the Responsible employee of branch of Bank.

3. The training will be carried out(spent) on following directions:

- Acquainting with legislative base in sphere of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism and brought in in it(her) changes;

- Acquainting with rules of the internal control of Bank with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism;

- Realization of practical employment(occupations) with the employees of Bank (branch) on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

4. The training will be carried out(spent) regularly, not less often than once in a year.

5. The employees of Group financial monitoring (Responsible employees of branches of Bank) advise the employees of Bank on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism during execution(performance) by them of the official duties.

6. For increase of the professional level, as required, employees of Group financial monitoring (the Responsible employees of branches of Bank) participate in conferences, seminars and other measures (including international), counteraction devoted problems laundering of the incomes, received by criminal way, and financing terrorism.

The order of organization in ROSEVROBANK JSCB work on a refusal from the conclusion of the contracts of the bank account (contribution) with the physical and legal persons and refusal in fulfilment of the order of the customer about realization of Operation, and also on stay of Operations with money resources or other property.

1. General provisions.

The present order regulates actions уполномоченных of the employees ROSEVROBANK JSCB (further - Bank) at the conclusion of the contracts of the bank account (contribution) and fulfilment of the orders of the customers about fulfilment of Operations with money resources or other property.

Under responsible by the employees in the present order the employees of Bank (branch) are understood which by virtue of the official duties, or on the basis of the power of attorney, Order or the orders of the Chairman of Government of Bank carry out actions on the conclusion of the contracts of the bank account (contribution) with the physical or legal person on behalf of Bank, and also the employees, for which are fixed the rights and duties on study of the documents, tax and

analysis of the information about the customer of Bank (including Potential) and character of his(its) activity and (or) fulfilment of the orders of the customers about fulfilment of Operations with money resources or other property.

2. Order of organization of work in structural divisions of Bank (branches) on a refusal from the conclusion of the contracts of the bank account (contribution) with the physical and legal persons.

2.1. According to item 5 of article 7 of the Law the Bank may refuse the conclusion of the contract of the bank account (contribution) with the physical or legal person in the following cases:

- Непредставление by the appropriate legal or physical person or representation by him(it) of the doubtful documents, necessary for confirmation items of information, specified in article 7 of the of the Law;

- Concerning the given legal or physical person the items of information on participation in террористической of activity, received in the order, established by item 2 of article 6 of the Law are available.

The order of definition(determination) of the list of such persons both organizations and finishing it(him) up to the items of information of credit organizations is established by the Resolution of Government РФ from 18.01.2003 № 27 " About the statement of a Rule(situation) about the order of definition(determination) of the list of organizations and physical persons, concerning which items of information on their participation in экстремистской of activity, and finishing of this list up to the item of information of organizations, carrying out Operations with money resources or other by property " (further - the List) are available.

2.2. In a case непредоставления by the customer or person, уполномоченным according to the legislation, to open the account (contribution) on behalf of the legal or physical person, all items of information and documents, necessary for study and identification of the customer and it(him) уполномоченного of the person, Responsible the employees of Management on work with the customers (the employees of a department of opening of the accounts of branch or additional office) Bank refuse in opening the account (contribution) up to a moment of granting by the customer or уполномоченным by the person of all necessary documents.

The underground group of the items of information necessary for identification is resulted(brought) in " the Program of study and identification of the customers of ROSEVROBANK JSCB.

The list of the account necessary for opening (contribution) documents is established by the internal documents of Bank, регламентирующими the order of opening of the accounts to the legal and physical persons.

2.3. Acting(arriving) items of information and the documents, necessary for study and identification of the potential customer, are checked responsible by the employees of Management on work with the customers of Bank (branch), for their reliability and revealing of the items of information about participation of the potential customer of Bank in террористической of activity, received in the order, established in item 2 of article 6 of the Law.

At occurrence at уполномоченного of the employee of Management on work with the customers of doubts concerning reliability of the submitted information or participation of the customer in террористической of activity, item of information and the documents are transferred in a Service of safety of Bank (further - СБ of Bank) for realization of additional check.

2.4. By results of check by division, spending check, motivated conclusion about expediency of the conclusion (refusal in the conclusion) contract of the bank account (contribution) prepares.

2.5. On the basis of the motivated conclusion and according to the internal documents of Bank, регламентирующими the order of opening of the accounts, Vice-president of Government of Bank, курирующий work with the customers, (the Manager by branch) accepts the final decision on expediency of the conclusion (refusal from the conclusion) contract of the bank account (contribution) with the legal or physical person.

2.6. On all cases of a refusal from the conclusion of the contract of the bank account (contribution) Group financial monitoring (Responsible employee of branch) and СБ of Bank is immediately informed.

3. Order of organization of work in structural divisions of Bank on stay of Operations with money resources or other property.

3.1. According to item 10 of article 7 of the Law the Bank stops Operations with money resources or other property (except for Operations on transfer of money resources, acting on the account of the physical or the legal of the person), if though one of the parties of Operation is organization or physical person, concerning which articles 6 received according to item 2 of the Law, the item of information on their participation in террористической of activity, or legal person, directly or indirectly being in the property or under the control of such organizations or person, either physical or legal person, working from a name or on the instruction(indication) of such organizations or the person are available,.

To stay are subject all above-stated Operations outside of dependence on a sum of Operation.

3.2 With the purposes of realization of the above-stated requirements of the legislation the software ABC of Bank at the Responsible employee of Group financial monitoring (Responsible employee of branch) on the basis of key attributes automatically form the list of all расчетно-payment documents, being subject to stay.

Key attribute is concurrence of data, contained in the расчетно-payment documents, with data of the List.

3.3. Responsible the employees of Management of the interbank attitudes(relations) and Department SWIFT/TELEX carry out the daily additional control for spent by Bank and his(its) customers by Operations for revealing Operations of the persons, included in the List.

3.4. Responsible the employees depositария of Bank carry out the daily control for Operations on crediting/debiting of securities for revealing Operations of the persons, included in the List.

3.5. At revealing the above-stated Operations Responsible the employees of divisions of Bank immediately notify GROUP financial monitoring (Responsible employee of branch).

3.6. On the basis of the specified list, given given the structural divisions of Bank and information СБ of Bank by the Responsible employee of Group financial monitoring (Responsible employee of branch) in a day of revealing of such Operations form the list of Operations, being subject to stay, and is transferred to the Chairman of Government of Bank for acceptance of the final decision.

3.7. Accepted by the Chairman of Government of Bank the decision immediately is possible up to the item of information of the Vice-president of Government of Bank, курирующего work with the customers (Manager by branch), Chief Accountant of Bank and Responsible employee of Group financial monitoring (Responsible employee of branch) and СБ of Bank.

3.8. On the basis of the decision of the Chairman of Government the Bank stops the above-stated Operations (except for Operations on transfer of money resources, acting(arriving) on the account of the physical or the legal of the person) for two working days from the date of, when the orders of the customers about their realization should be carried out, and it is not later working day,

following for in the afternoon stay of Operation, the Responsible employee of Group financial monitoring (Responsible employee of branch) directs the information on them in Responsible a body.

3.9. At non receipt during the above-stated term of the resolution уполномоченного of a body about stay of the appropriate Operation on additional term on the basis of a part of the third article 8 of the Law the Bank carries out Operation with money resources or other property under the order of the customer, if according to the legislation of Russian Federation other decision, limiting its(her) realization, is not accepted.

4. Order of organization of work in structural divisions of Bank on a refusal in fulfilment of the order of the customer about realization of Operations under the account.

4.1. According to item 11 of article 7 of the Law the Bank can give up in fulfilment of the order of the customer about fulfilment of Operation (except for Operations on transfer of money resources, acting(arriving) on the account of the physical or the legal of the person), on which documents, necessary for fixation for the information according to rules(situations) of the Law, are not submitted.

4.2. About non-presentation by the customer of Bank of the documents, necessary for fixation for the information according to the requirements of the Law, employee of Group financial monitoring (the Responsible employee of branch) in a day of revealing of Operation forms the list of Operations, on which there are not enough necessary documents, with the instruction(indication) of the documents absent on each separate Operation, and appropriates(gives) by such document in ABC of Bank the status " requires(demands) the analysis ".

4.3 At occurrence of doubts in qualification of Operation the Responsible employee of Group financial monitoring (the Responsible employee of branch) addresses for an advice in Legal management of Bank and (or) СБ of Bank.

4.4. After reception of advice the List is transferred to the Chairman of Government of Bank for acceptance of the final decision.

4.5. Accepted by the Chairman of Government of Bank the decision immediately is possible up to the item of information of the Vice-president of Government of Bank, курирующего work with the customers (Manager by branch), Chief Accountant of Bank and Responsible employee of Group financial monitoring (Responsible employee of branch) and СБ of Bank.

THE PROGRAM OF CHECK (AUDIT) SYSTEM OF THE INTERNAL CONTROL

ROSEVROBANK JSCB with the purposes of counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

1. The present program regulates the order of organization and realization of the internal and external control (аудита) on conformity of system of the internal control ROSEVROBANK JSCB (further - Bank) requirements of the legislation РФ on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

2. The external control (аудит) for conformity of system of the internal control of Bank to the requirements of the legislation РФ on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism comes true responsible by state bodies, self-adjustable by organizations, the member of which is Bank, and independent аудиторскими by the companies in limits of their competence.

3. The internal control (аудит) for conformity of system of the internal control of Bank to the requirements of the legislation РФ on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism comes true by a Service of the internal control of Bank (further - СВК) and employee of branch of Bank, carrying out functions of the representative СВК in branch.

4. The checks within the framework of internal аудита will be carried out(spent) in the order and terms, established by the quarterly plan of checks СВК, confirmed President of Bank. The checks will be carried out(spent) in view of the normative legal certificates(acts) of Bank of Russia, Federal body of the executive authority on realization of state policy(politics) in the field of the market of valuable papers and financial markets and уполномоченного of a body, регламентирующих the procedure by the specified bodies, control for execution(performance) by credit organizations of the legislation РФ on counteraction of legalization (laundering) incomes, received by criminal way, and financing terrorism.

5. On totals (results) of internal check the report with the instruction(indication) of revealed infringements, recommendations for their elimination and prevention(warning) of similar infringements in future is made. СВК of Bank (employee of branch of Bank, carrying out functions of the representative СВК in branch) carries out the control for duly execution(performance) of the given recommendations.