

## INFORMATION AND TERMS OF MONEY TRANSFERS FOR RETAIL CUSTOMERS WITHOUT A BANK ACCOUNT

Cash transfers in the currency of the Russian Federation and foreign currency at the request of clients without a bank account (hereinafter referred to as the Transfers) shall be made by ENERGOTRANSBANK CB (JSC) in compliance with the legislation of the Russian Federation, the regulations of the Bank of Russia, the rules applied by applicable money transfer systems and the bylaws of ENERGOTRANSBANK CB (JSC) (hereinafter referred to as the Bank).

1	Information on money transfer locations offered by the Bank for transfers within the Russian Federation and cross-border transfers.	<p>The Bank shall make the Transfers by remitting the money directly to the recipient's bank account in any locations using the Bank's network of correspondent banks.</p> <p>For cash Transfers within the Russian Federation or to foreign countries using any of the money transfer systems offered by the Bank, the information on the Transfer locations shall be published on official websites of the payment systems offered by the Bank.</p>
2	Information on availability of Transfers using payment systems and foreign payment systems or other means other than payment systems, including the list of payment systems and foreign payment systems offered by the Bank for Transfers.	<p>The Bank offers direct Transfers (with funds being credited directly to the recipient's bank account) and Transfers via Russian and foreign payment systems:</p> <ul style="list-style-type: none"> <li>– KoronaPay Payment System</li> </ul>
3	Information on how to receive money.	<p>The recipient can receive the money:</p> <ul style="list-style-type: none"> <li>– by crediting the funds directly to the bank account;</li> <li>– in cash at the cash offices.</li> </ul> <p>Information on how to receive money is available for general public on the official websites of the payment systems offered by the Bank.</p>
4	List of documents (information) to be presented by the client for money transfer, including the list of documents (information) required for identification of the client, the client's representative, beneficiaries or beneficial owners, or for simplified identification as per the Federal Law No. 115-FZ dated 07 August 2001 "On Combating Legalisation (Laundering) of Proceeds of Crime and Financing of Terrorism".	<p>Transfers shall be made on the basis of the application bearing a handwritten signature of the sender on presentation of an identity document.</p> <p>Pursuant to the legislation of the Russian Federation, identity documents include:</p> <p>For citizens of the Russian Federation:</p> <ul style="list-style-type: none"> <li>– passport of the citizen of the Russian Federation;</li> <li>– passport of the citizen of the Russian Federation, diplomatic passport, service passport certifying the identity of the citizen of the Russian Federation abroad;</li> <li>– temporary identity document of the citizen of the Russian Federation issued for the period of replacement of the passport of the citizen of the Russian Federation;</li> </ul> <p>For foreign citizens:</p> <ul style="list-style-type: none"> <li>– passport of the foreign citizen;</li> </ul> <p>For stateless persons:</p> <ul style="list-style-type: none"> <li>– document issued by the foreign state and recognised under the international treaty with the Russian Federation as a document certifying the identity of the stateless person;</li> <li>– temporary residence permit, permanent residence permit of the stateless person;</li> <li>– document certifying the identity of the person without a valid identity document issued for a period of processing of the application for Russian citizenship or recognition of Russian citizenship;</li> <li>– refugee identity card, notification that the application for recognition of the refugee status in the Russian Federation is being reviewed on the merits.</li> </ul> <p>Any foreign citizen or stateless person temporary residing in the Russian Federation must, in addition to the documents listed in this clause, present the following documents (if such documents are required by the Russian and/or international legislation):</p> <ul style="list-style-type: none"> <li>– migration card;</li> <li>– document certifying the right of the foreign citizen or stateless person to stay (reside) in the Russian Federation (for example, visa) and certificate of temporary registration.</li> </ul> <p>Any documents prepared in a foreign language either in full or in part (apart from documents certifying the identity of individuals issued by the competent authorities of foreign states and prepared in several languages, including the Russian language) shall be presented to the Bank along with a duly certified translation to the Russian language.</p> <p>Duly certified translation to the Russian language needs not be attached to the documents certifying the identity of the individual if such documents were issued by the competent authorities</p>

		of foreign states, provided that such individual possesses a document confirming his/her legitimate right to stay in the Russian Federation (for example, visa or migration card).
5	Money Transfer processing time.	The Transfer shall be made by the Bank on or before the next business day following the date when the sender sent the money via the Bank. Some of the money transfer systems offered by the Bank transfer money instantly. The Bank is not responsible for any delays in payment/crediting of funds by the recipient's Bank/cash office of the money transfer system.
6	Restrictions on receipt of money in foreign states (if applicable).	Prior to making a Transfer to a foreign state the Bank's employee informs the client on the restrictions (if any) on receipt of transferred money in the selected foreign state. Besides, such information is available for general public on the official websites of the payment systems offered by the Bank.
7	Information to be communicated by the sender for the recipient to receive the money Transfer.	In order to receive the cash Transfer at the cash office of the selected money transfer system offered by the Bank the sender must communicate to the recipient the Transfer check code, full name of the sender and the Transfer amount.
8	Terms of additional services, if any (for example, informing the client on the transfer status), associated with the money Transfer including the information on their price (if any).	<p>The Bank provides additional services as per the Bank's Charges. Such services include:</p> <ul style="list-style-type: none"> <li>– re-issue of the payment confirmation;</li> <li>– update, amendment of terms, payment cancellation, money transfer investigation, inquiries on the sums transferred and sums non-received;</li> <li>– information on SWIFT transfers made by individuals in a foreign currency.</li> </ul> <p>Information on the Bank's Charges is published on the Customer Information stands at the Bank's offices and on the Bank's official website at <a href="https://www.energotransbank.com">https://www.energotransbank.com</a></p> <p>Additional services are also provided by some of the money transfer systems offered by the Bank (such as transfer status tracking). Depending on the selected system, additional services may be fee-based. You may find this information on the official website of the Payment System that you selected for your Transfer.</p>
9	Recall of money transfer order and return of transferred funds to the sender (if available as per the money transfer terms).	<p>No direct Transfer (without the use of payment systems) may be recalled after the moment the sender has paid the sum to be transferred without a bank account.</p> <p>In order to recall a direct Transfer the client needs to apply to the Bank's Manager that has effected the Transfer prior to placing the funds with the Bank's cash desk.</p> <p>In case the Transfer was made via any system offered by the Bank, but was not yet paid to the recipient, such Transfer may be recalled (cancelled).</p> <p>In order to return the money sent to the recipient's bank account, the sender needs to apply to the recipient or directly to the credit institution/foreign bank where the recipient's account is opened.</p> <p>Procedure for recall of Transfer orders is described in the Terms of Use of Payment Systems offered by the Bank and on the Bank's official website at <a href="https://www.energotransbank.com">https://www.energotransbank.com</a>.</p>
10	Return of funds to the sender in case the money Transfer service was not rendered or was rendered improperly;	<p>Transfers denied by the credit institutions where the recipient's account is opened due to wrong transfer details shall be returned to the sender automatically.</p> <p>If the Transfer remains unclaimed by the individual recipient within the period stipulated by the Terms of Use of Money Transfer Systems, the sum of the Transfer shall be returned to the sender's bank.</p> <p>The amount of commission paid when making a Transfer using the system provided by the Bank by the sender is subject to refund.</p> <p>Upon cancellation of the Transfers with no fee the credit institution where the recipient's account is opened shall be entitled to refund its expenses on such transaction at the cost of the sender either under a separate payment document or by withholding the amount of expenses from the sum of the cancelled transfer. The amount withheld shall be determined subject to the terms and conditions of the contracts entered into by the parties to the Transfer.</p>
11	Customer claims, credit institution's contact details and procedure for review of claims by the credit institution, including procedures for real-time interaction with the client.	<p>A claim may be registered at any office of the Bank only in person. Pursuant to the Bank's rules, a claim shall be reviewed and replied to within 30 (thirty) calendar days. Apart from a copy of the identity document and contact details, the applicant is advised to attach to the claim copies or original documents certifying the validity of claims (for example, the application for money transfer).</p> <p>In the event that the claim is not connected with the acts of the Bank's managers in charge for sending/paying out the transferred money, the Bank will accept the claim but will advise to apply directly to the money transfer system to expedite the issue.</p> <p>Contact details of all money transfer systems offered by the Bank are published on the Bank's official website at <a href="https://www.energotransbank.com">https://www.energotransbank.com</a> ("Retail Customers – Money Transfers" section).</p> <p>Credit institution's contact details.</p>

		<p>To contact the Bank, the clients shall call the Contact Centre (8-800-100-22-48), or dial the telephone number of the Bank's offices published on the main page of the website ("Units" section). The main page also contains addresses, working hours of each office and a map of the Bank's offices.</p> <p>If the client filed a claim or complaint using the "Contact Us" section on the Bank's website, the client will be invited to visit any office at the client's option to prepare the claim in writing. Contact details of each money transfer system are published on the Bank's website ("Retail Customers – Money Transfers" section).</p>
12	Potential risks of unauthorised access to the transfer identification information provided by the sender to the recipient and recommended mitigation measures.	<p>In order to mitigate the risks, the sender should not disclose any information on the Transfer to third parties, including the base identifier – Transfer number (if applicable), other Transfer details, including details of the recipient. If any third parties request the details or the number of the Transfer, such request should be denied.</p> <p>In case of transfer of money to individuals to be received in cash, the Sender should communicate to the recipient (only) the information required to receive the money.</p> <p>The Bank's official website at <a href="https://www.energotransbank.com">https://www.energotransbank.com</a> contains "Precautions for Money Transfer".</p>
13	Information on credit institutions, their offices and branches and/or bank paying agents (sub-agents) authorised to dispense cash, including their addresses and working hours, as well as the licence number and address of the parent credit institution.	Information on credit institutions, their offices and branches and/or bank paying agents (sub-agents) authorised to dispense cash, including their addresses and working hours are published on the official websites of the payment systems offered by the Bank. Prior to making the Transfer the Bank's employee shall communicate such information to the client.
14	Minimum and maximum sum of the money Transfer (if restricted by the Bank and/or the payment system's operator) subject to the requirements of the legislation of the Russian Federation and/or the legislation of the foreign state (for cross-border money Transfers).	<p>Pursuant to the requirements of the legislation of the Russian Federation and/or the legislation of the foreign state (for cross-border money Transfers), the minimum and maximum sums of the money transfer may be restricted depending on the Transfer location.</p> <p>The minimum and maximum Transfer sums are published on the Bank's official website at <a href="https://www.energotransbank.com">https://www.energotransbank.com</a> and official websites of the money transfer systems.</p>
15	Money Transfer commission payable by the sender and/or recipient for the money Transfer and charging procedure. Commission for additional services related to the money Transfer (if any).	<p>The Bank charges the commission (fee) for the Transfer and receipt of applications for cancellation of Transfers, and for additional services to the sender/recipient (as an individual) as per the applicable Bank's Charges.</p> <p>In case of a Transfer to be received in cash in the Russian Federation or abroad using a money transfer system offered by the Bank the commission shall be calculated and charged to the sender as per the Charges applied by the selected money transfer system. The amount of the commission depends on the Transfer location, country of the recipient, amount and currency of the Transfer and shall be calculated using dedicated software prior to the transaction.</p> <p>The commission (fee) for a Transfer in a foreign currency shall be paid by the client when effecting the transaction in rubles to be converted as per the official RUB exchange rate established by the Bank of Russia as at the date the Bank receives the Transfer order.</p>
16	Amount of the money Transfer, including Transfers in a foreign currency (if the currency paid by the sender differs from the currency to be transferred), plus commission (if any).	<p>The Bank shall transfer the amount shown in the client's order for the money Transfer.</p> <p>The Bank's commission (if any) for the Transfer shall be charged to the sender in addition to the amount of the Transfer, with the exception of cross-border transfer of money.</p>
17	Terms of currency conversion and exchange rate.	Depending on the selected payment system and the transfer location, the client may elect to send a dual currency Transfer. Dual currency Transfer means that the amount shall be sent in Russian rubles and received in the currency of the recipient's country. Currency conversion shall be made at the exchange rate applied by the selected transfer system. The exchange rate shall be communicated to the Clients in the Transfer Application.
18	Restrictions on transfer established by the legislation of the Russian Federation.	<p>Pursuant to the requirements of the legislation of the Russian Federation, resident individuals may effect the following transactions in a foreign currency without a bank account, provided that such transactions are not connected with any business or investment activities or private practice:</p> <ul style="list-style-type: none"> <li>– Transfer of a foreign currency or the currency of the Russian Federation effected by a resident individual from the Russian Federation to the amount not exceeding an equivalent of USD 5,000 at the exchange rate established by the Bank of Russia as at the money Transfer day during one operation day;</li> <li>– transfer by a resident individual to a non-resident in the Russian Federation to the amount not exceeding an equivalent of USD 5,000 at the exchange rate established by the Bank of Russia as at the money Transfer day during one operation day.</li> </ul>

From 01.04.2024 to 30.09.2024:

- sending money transfers outside the territory of the Russian Federation within a calendar month is limited to the amount of US \$ 10 000 or equivalent at the official exchange rate set by the Bank of Russia on the date of the money transfer;
- the sending of money transfers without opening an account by non-resident individuals (residents of unfriendly foreign states) has been suspended<sup>1</sup>

From 09.09.2024 to 09.03.2025:

- funds received as a result of a transfer without opening an account are issued to the recipient exclusively in rubles of the Russian Federation.

Non-residents shall be entitled, without any restrictions, to effect Transfers of foreign currency and the currency of the Russian Federation to non-residents in the Russian Federation without a bank account, and effect Transfers of foreign currency and the currency of the Russian Federation without a bank account from the Russian Federation, and receive Transfers of foreign currency and the currency of the Russian Federation in the Russian Federation without a bank account.

*Money transfer system apply the following restrictions on the Transfers without a bank account:*

1. Pursuant to the requirements of the Federal Law No. 115-FZ dated 07 August 2001 "On Combating Legalisation (Laundering) of Proceeds of Crime and Financing of Terrorism", the total amount of funds to be sent/received by one client is limited as follows:

- transfers sent – equivalent of 1 000,000 Russian rubles;
- transfers received – equivalent of 1 000,000 Russian rubles.

Any transfers to be sent/received without a bank account in excess or equal of the equivalent of 1 000,000 Russian rubles shall be made subject to presentation of certifying documents on or before the next business day after the date of the client's application to the Bank as follows:

- the client applies to the Bank and files the Application to send/receive the funds and the documents certifying the origin of such funds;
- The Bank reviews the documents so provided and, on or before the next business day, communicates the Bank's decision (approval/denial) to the client.

2. With effect from 16 April 2019 the maximum amount of the money Transfers made by the same sender within 30 consecutive calendar days was limited. The total amount of money Transfers made by the same sender to any of the countries within 30 consecutive calendar days shall include all Transfers made, irrespective of the currency or Transfer method. The restrictions are published on the Bank's official website at <https://www.energotransbank.com> and official websites of the money transfer systems.

3. The payment systems offered by the Bank may apply other restrictions on money transfers as per the requirements of the national legislation of the recipient's country. Information on such restrictions is also published on the official websites of the money transfer systems.

The Bank shall reject money transfers in the following cases:

- the sender has no identity document listed in clause 6 hereof (as required by the legislation of the Russian Federation);
- the money transfer transaction contradicts the requirements of the legislation of the Russian Federation.

The Bank shall accept the funds from the resident and non-resident sender (as an individual) for Transfer and shall dispense the cash amount of the Transfer to the resident and non-resident recipient (as an individual) as per the Retail Customers Servicing Schedule applied by the Bank for cash offices, operational units and internal structural units of the Bank.

The Bank shall make Transfers in rubles and foreign currency via the money transfer systems as per the Rules of Operation applied by the selected system and using the forms used by the selected system.

The Bank shall confirm the receipt of cash for Transfer by issuing to the sender (as an individual) of the second copy of the transfer application (payment order) certified by the designated employee of the Bank and second copies of credit slips showing the amount of the transfer and the commission (fee) for the Transfer.

If the client's Transfer application is received during a period when the same-day transaction could not be effected as per the Payment Schedule, the manager shall make a current-date stamp to certify receipt of the application, but the Bank's payment document will be issued on the next working day of the Bank.

The Bank shall be held liable as per the effective legislation of the Russian Federation for delayed transfer of money or transfer of money using incorrect details, if so happens through a fault of the Bank.

The Bank shall not be held liable and shall not return to the sender (as an individual) the commission (fee) paid by the sender for the Transfer if the sender has specified incorrect information on the recipient (recipient's bank), or if the credit institution to which the Transfer was made is unable to

<sup>1</sup> The list of unfriendly foreign states was approved by the Government of the Russian Federation pursuant to paragraph 14 of the Decree of the President of the Russian Federation dated 05.03.2022 No. 95 "On the temporary procedure for fulfilling obligations to certain foreign creditors"

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dispense the money to the recipient without a bank account, or if the sender (as an individual) has violated the requirements of the legislation of the Russian Federation, and in other cases when the Transfer could not be made (paid to the recipient) for reasons beyond control of the Bank.

In the event the Transfer has not been paid to the recipient by the other credit institution, the Bank shall call (if the Bank knows the telephone number of the client) the sender to notify of such fact and return the money. The sender (as an individual) may receive the money as per this clause during the limitation of action period.

The Bank shall confirm the payment of transferred cash by issuing to the recipient (as an individual) of the second copy of the Transfer payout application certified by the manager of the Bank and the payment slip showing the paid-out amount of the Transfer.

Amounts received by the Bank from individuals for money Transfer without a bank account are not subject to statutory deposit insurance requirements.

Any disputes arising between the Bank and senders and recipients (as individuals) of Transfers without a bank account shall be settled by negotiations or in a court of general jurisdiction.