

Terms of transfer/withdrawal of funds in rubles of the Russian Federation without opening bank accounts on behalf of individuals in ProCommerceBank Ltd.

1. Information about the directions of money transfers.

ProCommerceBank Ltd. (hereinafter - the Bank) carries out operations to transfer the currency of the Russian Federation (including cross-border money transfers) on behalf of individuals without opening a bank account. Transfers are carried out in compliance with the requirements of the currency legislation of the Russian Federation.

Payments of outgoing transfers by ProcommerceBank Ltd within the territory of Russian Federation is done to the receiver at the address of the receiver's bank's location in Russian Federation and their relevant local branches of which the list is given on the Bank's official website on the Internet information and telecommunications network <https://procommercebank.ru>.

Payment of outgoing transfer by ProcommerceBank Ltd outside the territory of Russian Federation (cross-border transfers) is done to the receiver at the location of his bank and at their relevant local branches within the territory of Turkish Republic.

2. List of payment systems. ProCommerceBank Ltd. carries out operations on the transfer/withdrawal of funds on the instructions/application of an individual without opening a bank account if these funds sent/received in Russian rubles through:

- the payment system of the Bank of Russia;
- SWIFT payment system.

3. Methods of receiving transferred funds. The funds transferred by the Bank may be credited to the beneficiary's bank account indicated by the sender or given to the recipient - an individual in cash, if the sent transfer does not provide for an open bank account in the beneficiary bank.

4. Documents required for transfer. The Bank carries out operations on the transfer/withdrawal of funds on the instructions/application of individual clients (hereinafter - clients) without opening an account, not related to their business activities, on the basis of the "Transfer Order without opening a bank account"/ "Application for receiving a transfer without opening a bank account" submitted/completed by the client.

The order/application is filled in directly by the client - an individual, performing this operation (hereinafter - the Sender/Recipient) or representative power of attorney with photocopy application identity document of the Sender/Recipient.

Power of attorney for the transfer of funds without opening an account must be notarized.

If necessary, the Bank provides a service for processing orders for transfer funds without opening a bank account/Application for receiving a transfer without opening a bank account.

On the basis of the Order for transfer of funds without opening a bank account / Application for receiving a transfer without opening a bank account, an employee of the Bank prepares credit order / expense order and payment document confirming transfer of funds using the account details specified in the Order.

In confirmation of the transfer of funds, the Payer shall be issued documents executed in accordance with the requirements of regulatory acts of the Bank of Russia.

5. Identification. The Bank employee accepts from the Sender/Recipient a Transfer Order without opening a bank account/ Application for receiving a transfer without opening a bank account, provided that he has a document proving his identity.

In order to identify a client - an individual, a client representative, a beneficiary, a beneficiary owner, the Bank requests information listed in Annexion No. 1 to these Terms.

6. Services for the transfer of funds through the payment system of the Bank of Russia and the SWIFT payment system are carried out on the following conditions:

6.1 Timing of the transfer of funds. The funds intended for transfer to the accounts of beneficiaries opened with the Bank are credited on the current day.

Cash in the currency of the Russian Federation, intended for transfer to accounts recipients opened with other banks are listed on the current day, if accepted by the Bank in the operating time until 17:00 (on Friday and pre-holidays - until 16:00).

6.2. Transfer fee. The Bank services for carrying out operations are paid in advance for each operation by depositing the amount of the commission in cash to the Bank's cash office/e The amount of remuneration for the transfer of funds, including for the additional services provided by the Bank, is determined by the Bank's Tariffs, which are available for review at the Additional Office "Timiryazevsky" of ProCommerceBank Ltd.

Conversion operations carried out within the framework of a transfer without opening an account are carried out without charging a fee at the rate set by the Bank at the time of the transaction.

6.3. The order of revocation, return the transfer. A transfer may be revoked by the Sender until it becomes irrevocable, namely, until the Sender deposits cash at the Bank's cash desk to transfer funds without opening a bank account.

A transfer without opening a bank account may be returned to the Bank by the beneficiary's bank due to incorrectly specified details, closing the beneficiary's account or for some other reason. The Bank notifies the Sender about the return of the transfer without opening a bank account by the phone number specified by the Sender and returns the amount of the transfer in cash. Cash withdrawal on the returned transfer without opening a bank account is carried out on the written application of the Sender upon presentation of an identity document. Commission remuneration paid earlier for sending a transfer is not returned by the Bank.

In the case of non-provision or improper provision of a funds transfer service without opening a bank account, the Bank shall refund the funds to the Sender. The refund policy includes:

- registration of a claim for a refund for the undelivered service;
- delivery of the claim to the Bank;
- waiting for a response and a refund.

6.4. The procedure for making amendments to the transfer. Amendments may be made to the sent transfer in the part of specifying the details of the Beneficiary: TIN, name, bank number of the Beneficiary. Based on a written application from the Sender, the Bank sends an e-mail to the beneficiary's bank to make amendments to the details of the sent transfer.

7. Restrictions on the amount of transfer. Resident individuals in accordance with the requirements of the Directive of the Bank of Russia of March 30, 2004. No. 1412-Y have the right to transfer from the Russian Federation without opening a bank account foreign currency or the currency of the Russian Federation in an amount not exceeding the equivalent of \$ 5,000 determined using official exchange rates of foreign currencies to the ruble set by the Bank of Russia on the date of the instruction to the Bank specified transfer.

The total amount of transfers of a resident individual from the Russian Federation without opening a bank account through the Bank during one transaction day cannot exceed the specified amount.

In accordance with paragraph 5 of Article 20 of Federal Law № 46-FZ dated 03/08/2022, in order to ensure financial stability, the Bank of Russia has the right, by decision of the Banking Supervision Committee or the Financial Supervision Committee, to suspend (restrict) operations of such bank, including money transfers without opening bank accounts outside the territory of the Russian Federation for a period of no more than six months Federation.

Information about the current restrictions established by the Bank of Russia is explained to the clients by an employee of the Bank before executing a money transfer operation without opening an account verbally.

8. Fraud warning. In order to avoid payment of funds to a person who is not the recipient of the transfer, the Sender must under no circumstances give any details of the transfer of funds in any form to third parties, with the exception of the recipient.

The client independently bears all the risks associated with unauthorized access by third parties to the information provided by the payer to the recipient in order to receive funds transfers.

9. The procedure for the presentation of client's claims. In the case of non-provision or inadequate provision of a funds transfer service without opening a bank account, a client-individual may send a written client's application to the Bank. The procedure for reviewing customer requests to ProCommerceBank Ltd. is available for review and posted at the Additional Office "Timiryazevsky" of ProCommerceBank Ltd. and on the website of ProCommerceBank Ltd. <https://procommercebank.ru>.

The term for consideration of the client's application by the Bank it should not exceed 15 working days from the date of receipt of the application to the Bank and its registration. Disagreements not settled by the Parties shall be resolved in accordance with the legislation of the Russian Federation.

10. The Bank has the right to:

- Refuse the Payer to transfer the funds if the payment document does not contain the information necessary for the transfer in accordance with the rules of non-cash payments, and also if the details of the transfer of funds do not comply with the requirements of the law.
- Refuse the Payer to transfer funds if there is suspicion that the operation is carried out for the purpose of legalizing (laundering) criminal proceeds or financing terrorism and financing the proliferation of weapons of mass destruction, as well as on other grounds provided for by Federal Law of 07.08.2001 115-Φ3 "On Counteracting Legalization (Laundering) of Proceeds from Crime and Financing of Terrorism".
- Request from the Client information about the Client, representatives, beneficiaries and beneficial owners of the Client, as well as any documents necessary for the Bank to perform the functions established by the Federal Law of 07.08.2001 No. 115-Φ3 "On Counteracting Legalization (Laundering) of Proceeds from Crime and the financing of terrorism".

11. The bank shall not be liable for violation of the terms of crediting (non-crediting) of funds to the client's account, if the breach of terms of crediting (non-crediting) was the result of an error made by the payer when specifying the details necessary for making the transfer and crediting the funds to the client's account.

12. The Parties (the Bank and Clients) undertake to process personal data of individuals transferred by one Party and received by the other Party in accordance with the requirements of the Federal Law No. 152-Φ3 "On Personal Data", including ensuring the confidentiality and security of personal data their processing.

13. Contacts:

The Bank: ProCommerce Ltd., Basic License No. 2996.

Bank Address: Moscow, Timiryazevskaya St., 1

If you have any questions regarding the execution of a transfer transaction without opening a bank account, individual clients can contact **the Additional Office "Timiryazevsky" of ProCommerceBank Ltd.** at:

Moscow, Timiryazevskaya St., 1 (Premier Business Center, 1st floor)

Phone: (495) 644-25-25, ext.6603.

Operating mode of AO "Timiryazevsky" of ProCommerceBank Ltd.:

09.00 - 18.00 (Monday - Thursday)

09.00 - 17.00 (Friday and pre-holiday days)

**Information requested in order to identify the client - an individual, a client representative,
a beneficiary, a beneficial owner:**

1. The data of the identity document (surname, name, patronymic (if any), date of birth, citizenship, details of the identity document);
2. Address of residence (registration) or place of stay;
3. The data of the document confirming the right of the foreign citizen or stateless person to stay (reside) in the Russian Federation, the data of the migration card;
4. TIN, IAN (SNILS) (if available);
5. Contact information (phone number, fax number, e-mail address, mailing address (if available));
6. Belonging to public officials, belonging to relatives of public officials;
7. Information on the purposes of establishing and the intended nature of business relations with a credit institution, on the objectives of financial and economic activity, on financial status, on business reputation, on the sources of origin of funds and (or) other property of the individual customer;
8. Information on the beneficial owner of the client, the availability of beneficiaries,
9. Information confirming that the person has the authority of the client's representative - name, date of issue, validity period, document number on which the client's representative's authority is based.

Identity document in accordance with the legislation of the Russian Federation is:

For citizens of the Russian Federation:

- passport of a citizen of the Russian Federation;
- a passport of a citizen of the Russian Federation, a diplomatic passport, a service passport certifying the identity of a citizen of the Russian Federation outside the Russian Federation;
- birth certificate of a citizen of the Russian Federation (for citizens of the Russian Federation under the age of 14);
- seafarer's identity card;
- Temporary identity card of a citizen of the Russian Federation issued for the period of registration of a passport of a citizen of the Russian Federation.

For foreign citizens:

- passport of a foreign citizen.

For stateless persons:

- a document issued by a foreign state and recognized in accordance with an international treaty of the Russian Federation as a document certifying the identity of a stateless person;
- temporary residence permit, residence permit;
- a document certifying the identity of a person who does not have a valid identity document for the period of consideration of an application for recognition as a citizen of the Russian Federation or for admission to citizenship of the Russian Federation;
- refugee certificate, certificate of consideration of the application for recognition as a refugee on the territory of the Russian Federation on the merits.