

## **1. Restrictions on Foreign Currency Transactions**

TBC Bank operates in compliance with regulations on international sanctions and has in place all relevant requirements and restrictive measures envisaged by the UN, UK, US and EU sanctions regimes.

TBC is permanently updating its internal policy/procedures in line with changes made to the sanctions regimes.

Therefore, the following important policy will apply to foreign currency transfers processed by TBC Bank:

- 1.1. Pursuant to a recent Executive Order, the Office of Foreign Assets Control ("OFAC") of the US Department of the Treasury has tightened the obligations of foreign financial institutions with respect to transactions related to the Russian Federation.** To comply with the restrictions, the Bank may require additional documentation / information (e.g. invoice, contract, certificate of origin of goods, etc.) to process **transactions related to the Russian Federation**. Please note that transactions involving designated/sanctioned persons or persons supporting Russia's **military-industrial base** are strictly prohibited.
- 1.2. The Bank's internal policy prohibits direct or indirect transactions with sanctioned countries including the Islamic Republic of Iran.** In particular, the prohibition applies to international trade settlements where the counterparty, the country of origin of goods, the transportation route or the country of registration of the transport involved (in air, water, land and railway transportation) is Iran/related to Iran or any other sanctioned country.

## **2. Terms of Outgoing Cross-Border Payments**

### **2.1. If your company plans to make money transfers to any of the following countries:**

- **Group I** – China, Singapore, India, Hong Kong, Malaysia, Indonesia, South Korea, Philippines, Taiwan, Iraq, Pakistan, Sri-Lanka (formerly Ceylon), Oman, Yemen, Qatar, Thailand, Myanmar (formerly Burma), Vietnam, the Kingdom of Saudi Arabia, Turkmenistan, Kuwait, Bahrein, Bangladesh, Cambodia, Brunei, Laos, Nepal;
- **Group II** – Turkey, Azerbaijan, Armenia, the Russian Federation, Kazakhstan, Kyrgyzstan, Belarus;
- **Group III** – The United Arab Emirates;

### **2.2. Please consider the following terms envisaged by TBC Bank's internal policy:**

- **If a money transfer is directly or indirectly related to the purchase or delivery of goods/import/transportation**, a customer must submit an **invoice** and/or a **contract** either via digital bank or in a branch, regardless of transaction currency. The following documents are additionally required:
  - **Certificate of Origin of Goods** – for money transfers to Group II and Group III countries;

- **Goods Transport Document** – for money transfers to Group I and Group III countries.

**Exclusions:** In case of Turkish Lira/TRY-denominated wire transfers to Turkey, which is a Group II country, **only invoice and/or contract suffices and the Certificate of Origin of Goods is not required.**

- 2.3. **If a money transfer is not related to the purpose/delivery of goods but is a commercial transaction by nature (e.g. provision of a service),** the following document(s) must be submitted either via TBC digital bank or in a TBC Bank branch regardless of transaction currency:

- **Invoice** and/or **Contract** – for money transfers to Group II and Group III countries;

**Exclusions:** In case of money transfers to Turkey, submission of an invoice/contract is not required if a transfer is not related to the purchase/delivery of goods, regardless of transaction currency.

### **3. Terms of Incoming Cross-Border Payments**

- 3.1. If you plan to receive payments from a foreign country, **the Bank may suspend the transfer and send you a notification via internet bank with a request to submit additional documents.** Please note that unless the documents are submitted, the money will be returned to the sender.
- 3.2. While this rule applies to all incoming payments regardless of the source country, transfers from the following countries are under special focus: **Azerbaijan, Armenia, the Russian Federation, Kazakhstan, Kirgizstan, Belarus, UAE.**

### **4. Document-Related Requirements**

- 4.1. An invoice/contract related to the purchase / delivery of goods must include the following data:
- The parties to the deal and their details
  - Date and reference number of the invoice/contract
  - Amount and currency
  - Terms of payment
  - Terms of delivery / INCOTERMS
  - Delivery date(s)
  - Product information: number of items, weight/volume (dimensions)
  - Manufacturer's name
  - Manufacturer's legal address
  - Country of origin
  - Commodity heading (HS code)
- 4.2. **Goods Transport Document** – transport documents related to the transaction, including:
- CMR – a document for the carriage of goods by road;
  - RWB – (Railway Bill) a document for the carriage of goods by railway;

- MAWB – (Master Air Waybill) a document for the carriage of goods by air;
- MBL – (Master Bill of Lading) a document for the carriage of goods by sea.

4.3. **The Invoice/Contract and the goods transport document must match.** Otherwise, the Bank may require additional documents.

4.4. **The Certificate of Origin of Goods** - a document identifying the country in which a product originates (is manufactured) and/or the manufacturer.

**5. Please note that if the Bank detects that a transaction is associated with sanctioned entities/restrictions, it reserves the right to:**

5.1. Suspend the transaction (incoming or outgoing transfer) for further examination and require relevant documents (by sending the customer an **internet/mobile bank notification**).

5.2. Require the customer to submit documentation on past transactions;

5.3. Cancel the transaction if the customer does not provide the required documentation and/or the transaction does not comply with the Bank's internal policy (the Bank will send the customer a relevant **internet bank notification**).

5.4. Close the customer's accounts (without prior notice).