



JSC "RIETUMU BANKA"  
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## CLIENT ASSESSMENT OF THE ELIGIBILITY OF SANCTIONS

Date \_\_\_/\_\_\_/20\_\_\_

Approved by the Board of JSC "Rietumu Banka", Minutes No. 31, 11.05.2022

COMPLETE IN BLOCK CAPITALS

**Non-compliance with the sanctions for Client may result with the liability under the law and the cooperation agreement with the Bank.**

**Please provide complete and truthful answers to all questions so that the Bank can assess the possibility of the Client's cooperation with partners/clients in sanction risk countries.**

### INFORMATION ABOUT THE COMPANY AND ITS ACTIVITIES

1. Full name	
2. Registration number	
3. Legal address	
4. Actual address	
5. Activity sector/sectors (except NACE Classification Codes)	
6. Goods which are produced, exported, imported, sold, acquired, transported or services which are provided or received by the company	
7. Regions/states where the company operates, offers or receives goods or services	<input type="checkbox"/> European Union (EU) <input type="checkbox"/> Russian Federation (Russia) <input type="checkbox"/> Republic of Belarus (Belarus) <input type="checkbox"/> CIS states <input type="checkbox"/> Other states (please specify) _____
8. Are the company's business partners or their owners, board members or beneficial owners related to Russia or Belarus?	<input type="checkbox"/> No <input type="checkbox"/> Yes (please specify) _____
9. Does the company work/cooperate with Russian or Belarusian state contractors (companies/organisations with state capital and/or state control)?	<input type="checkbox"/> No <input type="checkbox"/> Yes (please specify) _____
10. Whether the goods or services that are produced, imported or exported, sold, acquired, transported by the company may be subject to restrictions (sectoral sanctions) imposed by the USA and/or the EU? <a href="https://www.sanctionsmap.eu/">https://www.sanctionsmap.eu/</a> <a href="https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information">https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information</a>	<input type="checkbox"/> No <input type="checkbox"/> Yes (please describe) _____ _____ _____

X

(Signature of Client's representative)

<p>11. Does the company have bank/ financial institution accounts in other EU or third countries?</p>	<p><input type="checkbox"/> European Union (EU)</p> <p><input type="checkbox"/> Russian Federation (Russia)</p> <p><input type="checkbox"/> Republic of Belarus (Belarus)</p> <p><input type="checkbox"/> CIS states</p> <p><input type="checkbox"/> Other states (please specify) _____</p>
<p>12. Does the company have owner(s) or beneficial owner(s) that own other companies in other EU or third countries?</p>	<p><input type="checkbox"/> European Union (EU)</p> <p><input type="checkbox"/> Russian Federation (Russia)</p> <p><input type="checkbox"/> Republic of Belarus (Belarus)</p> <p><input type="checkbox"/> CIS states</p> <p><input type="checkbox"/> Other states (please specify) _____</p> <p><input type="checkbox"/> No, does not own other companies</p>
<p>13. Does the company use intermediaries (does not work with ultimate manufacturers and/or service providers and end users of goods and services) in Russia or Belarus, or third countries?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (please specify*) _____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><small>*It is mandatory to indicate the full name of the intermediary, country of registration, regions and countries of activity, its role in the cooperation and other relevant circumstances.</small></p>
<p>14. Is the company in any way related to the persons who are sanctioned by the UN, the EU, the US OFAC or the Republic of Latvia?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (please specify) _____</p>

Other information you wish to provide

\_\_\_\_\_

\_\_\_\_\_

**THE PROCEDURE OF COMPLIANCE WITH SANCTIONS IN THE COMPANY**

<p>15. Does the company make sanction check on its business partners/brokers/ customers <b>before</b> providing goods or services or executing payments?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, fully</p> <p><input type="checkbox"/> Partly (please describe) _____</p> <p>_____</p>
<p>16. Does the company <b>regularly</b> make sanction check on its business partners/ intermediaries/clients?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, fully</p> <p><input type="checkbox"/> Partly (please describe) _____</p> <p>_____</p>

X

\_\_\_\_\_  
(Signature of Client's representative)

17. Please indicate which sanctions the company is screening	<input type="checkbox"/> UN <input type="checkbox"/> EU <input type="checkbox"/> USA OFAC <input type="checkbox"/> Republic of Latvia <input type="checkbox"/> Other (please describe) _____
18. Please indicate the resource, systems, software which are used to conduct sanctions screening	
19. Does the company verify the compliance of activities related to operations, goods and services against export-import restrictions and sectoral sanctions?	<input type="checkbox"/> No <input type="checkbox"/> Yes (please describe) _____ _____
20. How the company follow to updates of the sanction regulation, amendments to the sanctions lists and restrictions on goods and services?	
21. Does the company document the sanction check?	<input type="checkbox"/> No <input type="checkbox"/> Yes (please describe) _____ _____
22. Has the company documented the procedure for checking compliance with sanctions?	<input type="checkbox"/> No <input type="checkbox"/> Yes
22. If the answer to the question 22 is "yes", please describe shortly how compliance with sanctions is performed in the company	

*Other information you wish to provide*

\_\_\_\_\_

\_\_\_\_\_

**PERSON RESPONSIBLE FOR COMPLIANCE WITH SANCTION**

24. Does the company have the employee(s) who control the compliance with sanctions?	Name, surname: _____ Position: _____ Mobile phone No. (+ country code): _____ E-mail: _____
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X

\_\_\_\_\_  
(Signature of Client's representative)

<p>25. Does the company provide to this (these) employee(s) the specific training about the sanction's compliance issues?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (please describe*) _____</p> <p>_____</p> <p><small>*Please indicate the frequency of training and the last attended training (indicate the date, organiser, topic, etc.)</small></p>
<p>26. Do you use external providers solutions for sanction checks, or does someone carry out these checks for your company?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (please describe) _____</p> <p>_____</p>

- Confirm that the company in its activity comply with the UN, EU, USA OFAC and the Republic of Latvia national sanctions.
- Confirm that all information provided above is complete and true.
- Confirm that I will inform the Bank immediately about changes in the information above.
- I confirm that I have attached to this questionnaire the company's internal rules – sanction compliance procedure, if the company has one.

**Client represented by** \_\_\_\_\_  
(name, surname)

X \_\_\_\_\_  
(signature)

**Basis for authorisation:** \_\_\_\_\_  
(please specify)

**Rietumu ID** \_\_\_\_\_ **Test-key** \_\_\_\_\_

**Additional information:**

Law on International Sanctions and National Sanctions of the Republic of Latvia <https://likumi.lv/ta/en/en/id/280278-law-on-international-sanctions-and-national-sanctions-of-the-republic-of-latvia>

EU Sanctions regulation <https://www.sanctionsmap.eu/>

USA Sanctions regulation <https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>

General information on sanctions from the Ministry of Foreign Affairs of the Republic of Latvia <https://www.mfa.gov.lv/en/sanctions>

General information about the sanctions from the Financial Intelligence Service of the Republic of Latvia <https://sankcijas.fid.gov.lv/>

General information of the Financial Industry Association of the Republic of Latvia on current sanctions <https://www.financelatvia.eu/en/russias-invasion-in-ukraine/>

EU regulation about the sectoral sanctions against Russia <https://www.sanctionsmap.eu/#/main/details/26/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>

EU regulation about the sectoral sanctions against Belarus <https://www.sanctionsmap.eu/#/main/details/2/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>