

# Financial Institutions Anti-Money Laundering, Counter Terrorism Financing Questionnaire

## I. GENERAL INFORMATION.

1. Name of the bank	In Kazakh (full): «Bereke Bank» Акционерлік қоғамы, Short: «Bereke Bank» АҚ In English (full): Bereke Bank Joint Stock Company, Short: Bereke Bank JSC In Russian (full): Акционерное общество «Bereke Bank», Short: АО «Bereke Bank»	
2. Legal form	Joint Stock Company	
3. State Registration number	930740000137	
4. Date of registration	Date of primary state registration: July 1, 1993 Date of state re-registration: March 15, 2007 Date of repeated state re-registration: September 14, 2022	
5. Registration body	The Ministry of Justice of the Republic of Kazakhstan	
6. Place of registration	Astana	
7. Tax identification number	930740000137	
8. Address of registration	Kazakhstan, 050059, Almaty, Bostandyk district, Al-Farabi Ave., 13/1	
9. Business address (if different from address of registration)	No different	
10. Mailing address (if different from address of registration)	No different	
11. Telephone and fax numbers, e-mail	+7 (727) 3210120 +7 (727) 3212180 E-mail: post@berekebank.kz	
12. Type of banking license. Issuing authority	License for banking and other operations and activities in securities market issued by the Agency for Regulation and Development of Financial Market of the Republic of Kazakhstan. Validity of the license: Indefinite.	
<i>Исключить.</i>		
14. License number	№ 1.2.199/93/31	
15. Date of issue of the license	20 September 2022	
16. SWIFT	BRKEKZKA	
17. Banking identification code (for resident banks only)	BRKEKZKA	
<b>II. MANAGEMENT AND OWNERSHIP STRUCTURE.</b>		
18. Please, provide information about your management bodies and mark <input checked="" type="checkbox"/> those of them, which are present at your place of registration:		
<input checked="" type="checkbox"/> General shareholders' meeting (please write name and title, if applicable):		
Name of shareholder	Percentage of share	Country of incorporation

JSC National Managing Holding 'Baiterek'	holding (%) 100%	Republic of Kazakhstan
--	---------------------	------------------------

☒ **Board of Directors (please write name and position)**

Full Name	Position	Country of incorporation
Maksat Nuridenuly	Chairman of the Board of Directors	Republic of Kazakhstan
Timchenko Andrey	Member of the Board of Directors	Republic of Kazakhstan
Madiyev Magzhan	Member of the Board of Directors, independent director	Republic of Kazakhstan
Yelesmesov Askar	Member of the Board of Directors, independent director	Republic of Kazakhstan
Abisheva Botagoz	Member of the Board of Directors, independent director	Republic of Kazakhstan
Hamitov Ersain	Member of the Board of Directors	Republic of Kazakhstan
Saidenov Anvar Galimullaevich	Member of the Board of Directors, independent director	Republic of Kazakhstan

☒ **Management Board (please write name and title)**

Full Name	Position	Country of incorporation
Timchenko Andrey	Chairman of the Management Board	Republic of Kazakhstan
Anikina Alina	Deputy Chairman of the Management Board	Russian Federation
Kasenov Serke	Deputy Chairman of the Management Board	Republic of Kazakhstan

**19. Please, provide information about share holders holding 10% or more.**

Name of shareholder	Percentage of share holding (%)	Country of incorporation
JSC National Managing Holding 'Baiterek'	100%	Kazakhstan, Astana, Yesil district, Mangilik El Avenue, building 55A

**19-1. Please, provide information about beneficiary owners holding 25% or more.**

The sole shareholder of Bereke Bank JSC ("the Bank") with 100% rights to own, use and dispose of its shares is Joint Stock Company National Management Holding Baiterek, a key financial institution of the Government of the Republic of Kazakhstan, which was established by the Decree of the President of the Republic of Kazakhstan dated May 22, 2013.

The Government of the Republic of Kazakhstan is the sole shareholder of Joint Stock Company National Management Holding Baiterek. The Government of the Republic of Kazakhstan is a collegial body exercising executive power of

the Republic of Kazakhstan, heads the system of executive bodies and directs their activities. Thus, there is no beneficial owner - a natural person based on the criterion of ownership of 25% or more (directly or indirectly (through third parties)) or the ability to control the actions of the Bank. Accordingly, in accordance with Article 5, paragraph 3, clauses 2-2 of the Law of the Republic of Kazakhstan, the head of the Bank's collegial executive body is recognized as the beneficial owner.

Full name	Percentage of share holding (%)	Country of incorporation

20. Does your bank have branches, subsidiaries, affiliates and representative offices?

☐ No ☒ Yes

If yes, specify them:

Name and type of business activity	Business address	Name of executive director
Almaty Branch	Almaty Gogol / Kaldayakova st. 30/26	Nurgalieva Elmira
Astana Branch	Nur-Sultan, Turan ave., 13	Karabaev Serik
Uralsk Branch	Uralsk, Mukhita street 27/4	Mynbaev Erkin
Atyrau Branch	Atyrau, st. Kulmanova, 119A	Mendigalieva Zauresh
Aktobe Branch	Aktobe, st. 101 str. Brigade 10 b/v	Seilkhanov Tolegen
Karaganda Branch	Karaganda city, Shakhterov ave. 35/1	Salokhin Pyotr
Almaty Region Branch	Taldykorgan, Abylaikhan St., 194A	Nurbekov Ahmed
Pavlodar Branch	Pavlodar, st. Lermontov 53/1	Kalinin Alexander
Aktau Branch	Aktau city, microdistrict 7, building 30 A	Tuleuzhanova Aigul
Kostanay Branch	Kostanay, Abai ave. 170	Karabaev Serik
Ust-Kamenogorsk Branch	Ust-Kamenogorsk, S. Nurmagambetov	Khan Ilya
Petropavlovsk Branch	Petropavlovsk st. Amangeldy 151 A	Terletsky Ivan
Shymkent Branch	Shymkent, st. Adyrbekova 34	Utemisov Marat
Kokshetau Branch	Kokshetau city, Abay street 86	Makhmudova Asel
Taraz Branch	Taraz city, Abay ave. 120v	Ergalieva Aigul
Kyzylorda Branch	Kyzylorda st. Korkyt Ata, 23	Berdieva Appakkyz
Turkestan Branch	Turkestan region, Aksukent village, st. Zhibek Zholy 36	Marat Utemisov
Abai Branch	Semey city, Kayym Mukhamedzhanov street, 1	Kurmanbayeva Gulmira

III. AML/CFTCONTROLS.

21. Are banks in your home country subject to laws tailored to counter money laundering and terrorism finance?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, If yes, specify them: 1. The Law of the Republic of Kazakhstan dated August 28, 2009, No 191-IV " On Anti-money Laundering and Combating the Terrorism Financing"
22. Has your Bank established internal policies, procedures and controls on prevention of money laundering and terrorism finance?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, If yes, specify them: Anti-Money Laundering and Combating the Terrorism Financing Policy of Bereke Bank JSC  - Instruction "Rules of internal control on anti-money laundering and combating the terrorism financing of Bereke Bank JSC"
23. Has your Bank established the «Know Your Customer» procedures including customer and beneficial owners identification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
24. Does your procedures include requirements on identification of "walk-ins" (persons that do not have accounts with the bank) by passport / ID card when accepting cash payments and retaining a copy of this document in the bank.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
25. Has your Bank developed standard questionnaires to document information about customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
26. Has your bank developed procedures on monitoring of transactions which are subject to AML/CFT legislation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
26-1. Does your bank conduct due diligence of the customer having direct access to correspondent accounts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Note: The Bank does not provide direct access to the correspondent accounts for clients.
26-2. If the answer to the question 26-1 "Yes", does Your bank is able to provide upon request information on the due diligence of the such customer?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Has your bank developed records keeping procedures?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, If yes, specify them: Documents and information, obtained as a result of due diligence, including file of the customer, information about the account, and correspondence with the customer are stored by the Bank for at least five years after the date of the termination business relationship with the customer. Documents and information about transactions with money and (or) other property subject to financial monitoring, and suspicious transactions, as well as the results of a study of all complex, unusually large and other unusual transactions must be stored by financial monitoring entities for at least five years after the transaction.
28. Has your bank developed training procedures on AML/CFT?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
29. Does your Bank open anonymous accounts to individuals	<input type="checkbox"/> Yes

and/or corporate customers?	<input checked="" type="checkbox"/> No
30. Does your Bank have correspondent relationships with financial institutions located/registered in off-shore zones (off-shore zone meaning a country or a territory with preferential tax regime and/or legislation, which does not allow disclosure of information on financial transactions)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
31. Do you have off-shore companies among your customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
32. Do you have customers who do not have the physical presence of the permanent government in the country where they are registered (shell companies)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
33. Does your Bank have "shell banks" as correspondents or counterparts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
34. Has your bank been the subject of any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorists financing in the past five years?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, <p>2020. violation by the entities of financial monitoring of the laws of the Republic of Kazakhstan on anti-money laundering and combating the terrorism financing in terms of documenting and providing information about transactions subject to financial monitoring to their clients.</p> <p>In 2020, the Republican State Institution "Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market" (ARRFR) conducted an audit of the Bank's activities for compliance with the requirements of the Law of the Republic of Kazakhstan dated August 28, 2009 No. 191-IV "On Countering the legalization (Laundering) of proceeds from crime and the financing of terrorism."</p> <p>An audit was conducted to ensure compliance with the requirements of AML/CFT legislation - the Bank's internal regulatory documents, software and the process of identifying suspicious transactions of the Bank's customers, checking compliance with identification requirements, KYC measures and proper implementation of other programs established by the Bank in the AML/CFT Internal Control Rules.</p> <p>As a result of the audit, several transactions (committed in 2018-2019) were identified that are subject to financial monitoring and, information on which was not sent to the authorized body (the Financial Monitoring Committee of the Ministry of Finance of the Republic of Kazakhstan). In this regard, the Bank was imposed an administrative penalty in the form of a fine in the amount of 11,134,200 tenge (eleven million one hundred thirty four thousand two hundred tenge).</p> <p>No other significant violations have been identified. The Bank was given some recommendations regarding software improvements, amendments to internal regulatory documents, etc.</p> <p>Measures to eliminate the causes of these violations were carried out by the Bank and fully completed in 2021.</p> <p>AML/CFT procedures are constantly being optimized and regular measures are being taken to</p>

update the Bank's internal regulatory documents and processes.

35. Does your Bank have Money Laundering Reporting Officer or another senior official designated to monitor suspicious client activities and to ensure compliance of your Bank with legislation and regulatory requirements relating to prevention of money laundering?

☐ No

☒ Yes,

If yes, please specify contact details:

**Full name: Anikina Alina**

**Title: Deputy Chairman of Management Board**

**Telephone: ++7 (727) 3210120**

**+7 (727) 3212180 ext. 601 013**

**E-mail: Alina.Anikina@berekebank.kz**

On behalf of the bank

**Full name: Nagay Valentina**

**Title: Director of International Relations and Trade Finance Department**



(Signature)

Seal

Date: 22.02.2024

