

CLIENT QUESTIONNAIRE

AS Citadele banka Estonian branch, registry code 11971924
Narva mnt 63/1, 10152 Tallinn Republic of Estonia

Customer No.
(filled out by the Bank)

Date

Dear Client, under the legal enactments in the field of anti-money laundering, counter terrorist and proliferation financing, sanction risk management and international banking standards binding on the Bank and its group companies (the "Bank"), the Bank is obliged to collect information as per questions listed in the Questionnaire.

The Bank guarantees the confidentiality of the Client's personal data, accounts, deposits and transactions in accordance with the regulatory enactments.

Please write all amounts in EUR. Thank you for your understanding!

Client information

Name

Legal status (e.g. LLC, JSC, etc.) Country of registration

Registration number Registration date

Contact information

Legal address

Street

House No./ name/ building/ Office No.

City/ Populated area/Parish/ County

Country

Postal code

Actual address of the main office: Is it the same as the legal address? Yes No, please specify

Street

House No./ name/ building/ Office No.

City/ Populated area/Parish/ County

Country

Postal code

Correspondence address: Legal address Actual address of the main office

Telephone: Number Country/code

Number Country/code

Email Website

Branches, representative offices abroad: Yes (please specify the actual location address): No

1.

2.

street, house No. /building /name, apartment No., city (district, populated area), postcode, country

Contact person

Name, surname Telephone:

Personal code / identification number (if known) Date of birth (if known)

Information on tax residency¹

Please list all tax residency countries and taxpayer identification numbers

Country	Taxpayer identification numbers

Is activity in line with any of the legal forms and/or business activities below? **No** **Yes**

If you answered "Yes", please tick accordingly

<input type="checkbox"/> State/municipal institution or a company wholly owned by a state/municipal institution	<input type="checkbox"/> Intergovernmental/transnational organisation which has a valid agreement regarding the location of its headquarters in the Republic of Estonia and from the operation of which no income is acquired by individuals
<input type="checkbox"/> Stocks of the company are traded on a regulated financial instrument market	Regulated market name Regulated market country
<input type="checkbox"/> Parish, religious association (church), diocese	<input type="checkbox"/> Apartment, garage, summer house owners' association
<input type="checkbox"/> Employers' organization, trade union, professional association and foundation	<input type="checkbox"/> Charity fund
<input type="checkbox"/> Trading in precious metals, precious stones, art and antiques	<input type="checkbox"/> Trade and production of arms and ammunition, including items subject to sectoral sanctions or goods of strategic significance ¹¹
<input type="checkbox"/> Virtual currency trading/activities related to virtual currencies and/or initial coin offering (ICO)	<input type="checkbox"/> Electronic money institution/electronic money-related activities
<input type="checkbox"/> Payment institution/provision of payment services	<input type="checkbox"/> Crowdfunding platform operator

Information about economic activity

Number of employees

Total assets (balance sheet) (EUR) Total annual turnover (EUR)

Main activity NACE code (statistical classification of economic activities in the European Community)

NACE industry code(s) of economic activity under which the services/ products offered by the Bank will be used:

1.	2.
3.	4.

Detailed description of economic activity

.....

Country of main activity

1.	2.
3.	4.

Is a license or special registration needed to perform economic activity? **No** **Yes**

Information about income structure

Is the company a Passive Entity³ that is not a Financial Institution⁴? **No** **Yes**

Is the company a Financial Institution⁴?
 (may be omitted if you answered "Yes" to the previous question) **No** **Yes, please specify**

- GIIN number (Global intermediary identification number) _____ . _____ . _____ . _____
- Form [W8BEN-E](#) will be submitted

Is the company an Investment Entity⁵ managed by another Financial Institution⁴? **No** **Yes**
 (may be omitted if you answered "Yes" to one of the previous questions)

Source of income

<input type="checkbox"/> Revenue from the company's business activities	<input type="checkbox"/> Financial support from state/ international bodies	<input type="checkbox"/> Investments
<input type="checkbox"/> Loans/ credits	<input type="checkbox"/> Donations	<input type="checkbox"/> Dividends
<input type="checkbox"/> Proceeds from sale of real estate	<input type="checkbox"/> Other (please specify).....	

Does the company have accounts in other banks?
 No Yes, please specify

Bank	Bank code (BIC/SWIFT) If known	Country
1.		
2.		
3.		
4.		

Information about transactions in the Bank
Bank services planned to be used

<input type="checkbox"/> Bank accounts/ Payment plans/ Remote account management	<input type="checkbox"/> Credit cards	<input type="checkbox"/> Deposits
<input type="checkbox"/> Currency exchange	<input type="checkbox"/> Loans/credits	<input type="checkbox"/> Cash deposits
<input type="checkbox"/> Leasing	<input type="checkbox"/> Factoring	<input type="checkbox"/> Trade financing
<input type="checkbox"/> Other services (please specify).....		

Planned non-cash operations/ transaction volume in accounts

Amount (EUR)	Total deposits	Non-cash transactions (EUR)	
		Incoming payments <i>(How much per month you plan to receive in the account(-s))</i>	Outgoing payments <i>(How much per month you plan to transfer from the account(-s))</i>
Less than 15,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15,000 – 30,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30,000 – 60,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
60,000 – 150,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
150,000 – 300,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
300,000 –700,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
More than 700,000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>If the amount exceeds 700,000, please specify the amount</i>			
Planned maximum amount of one transaction	<i>please leave blank</i>		
Payments will be made/ received within these countries	<i>please leave blank</i>	1. 2. 3. 4. 5.	1. 2. 3. 4. 5.

Cash transactions (EUR)	Cash deposit <i>(How much per month you plan to pay into the account(-s))</i>	Cash withdrawal <i>(How much per month you plan to withdraw from the account(-s))</i>
Amount		
Planned maximum amount of one transaction		

Information about cooperation partners**Main partners from whom payments are planned to be received**

Name	Registration No. <i>(if known)</i>	Country of registration	Country where the account from which a payment will be made is opened
1.			
2.			
3.			
4.			
5.			

Main partners to whom payments are planned to be made

Name	Registration No. <i>(if known)</i>	Country of registration	Country where the account to which a payment will be made is opened
1.			
2.			
3.			
4.			
5.			

Statement on the beneficial owners⁶, representatives, shareholders**Does the legal entity have beneficial owners⁶ other than tax residents² of the Republic of Estonia?** **No** **Yes, please specify**

1. Country	2. Country
3. Country	4. Country

Does the legal entity have beneficial owners⁶/ representatives/ shareholders who are politically exposed person ⁷, family member of a politically exposed person ⁸, or person closely associated to a politically exposed person ⁹? **No** **Yes, please specify**

- The legal entity's representative is a politically exposed person ⁷, family member of a politically exposed person ⁸, or person closely associated to a politically exposed person ⁹
- The Beneficial Owner, shareholder is a politically exposed person ⁷, family member of a politically exposed person ⁸, or person closely associated to a politically exposed person ⁹

Reason for account opening in Estonia (please fill out only if the legal entity is registered outside the Republic of Estonia)

Reason	Explanation
<input type="checkbox"/> Employees in Estonia	
<input type="checkbox"/> Business in Estonia	
<input type="checkbox"/> Real estate in Estonia	
<input type="checkbox"/> Business partners in Estonia	
<input type="checkbox"/> Other reason	

Client's signature and declaration

I hereby confirm that the information provided herein is complete and true and I am aware of liability under applicable laws for the provision of false or misleading information. I also confirm that I am authorized to provide the information and make the declarations mentioned herein on behalf of the Client, and the information at my disposal is sufficient to provide the data requested herein.

I confirm that I am aware of the obligation to comply with the regulatory framework of international and national sanctions¹⁰, including that I will not make the transactions directly or indirectly related to a person or territory against which international or national sanctions have been imposed by international organizations or countries¹⁰.

I confirm that the economic or personal activity of the legal entity's member or shareholder, beneficial owner, authorized representative or cooperation partner is not related to trade, production, export or import of the items subject to sectoral sanctions or dual-use items, or specialized foreign agencies (military design bureaus, space technology research agencies, etc.).

I am aware that the Bank and its group companies process my personal data for the purposes of anti-money laundering, counter terrorist and proliferation financing and sanction risk management in order to comply with regulatory requirements provided that my rights are exercised in accordance with the Privacy Protection Rules available at www.citadele.ee.

I undertake to immediately notify the Bank of any changes in the information provided herein.

.....
Name, surname of the Client's representative

.....
Signature

Date

Accepted by the Bank's employee (the Bank's authorised person)

(Name, surname, personal stamp)

Date Signature

¹ **Tax Residency** – a country under the legal enactments of which the Client is considered to be this country's tax resident on the basis of location of the Client's central management, place of registration/ incorporation or any other criterion which, under the law of that country, is the basis for considering the Client a tax resident of that country and imposing taxes on the Client's income in the respective country.

² **Tax Resident** – an individual whose income is subject to taxation under the laws and regulations of the relevant country, e.g. based on the person's domicile, duration of stay (usually 183 days or longer in a 12-month period), close personal or economic relations or other criteria serving as the basis for the taxation of income in the relevant country (e.g. in the USA, inter alia, a US citizen/resident to whom a residence permit (Green Card) has been issued is considered a US tax resident).

³ **Passive Entity** – a legal entity for which more than 50 % of the Client's gross income for the preceding calendar year is passive income* and more than 50% of the assets held by the Client in the previous calendar year are assets that are held to generate passive income.

* **Passive Income** – a portion of the company's income consisting of:

- dividends;
- interest and income equivalent to interest;
- rents and royalties, other than rents and royalties derived in the active conduct of a business conducted by employees of the Client;
- annuities;
- the excess of gains over losses from the sale or exchange of financial assets that gives rise to the above-mentioned passive income (except income resulting from the core activity of a broker (dealer));
- the excess of gains over losses from transactions (including futures, forwards, options, and similar transactions) in any financial assets (except income resulting from the core activity of a broker (dealer));
- the excess of foreign currency gains over foreign currency losses (except income resulting from the core activity of a broker (dealer));
- net income from swaps (except income resulting from the core activity of a broker (dealer));
- amounts received under Cash Value Insurance Contracts;
- other income which, by its economic nature, is comparable to the passive income referred to above.

⁴ **Financial Institution** – a legal entity rendering any of the below services within the framework of its economic activities:

- acceptance of deposits (as the Client's main activity) within the framework of banking or similar business;
- trading in money market instruments (cheques, bills, derivatives, deposit certificates etc.), interest rate and index instruments, foreign exchange instruments, transferable securities or commodity futures traded on a regulated market dealing as per orders of its clients or on behalf thereof;
- individual and/or collective securities portfolio management performed by the Client as per orders of its clients or on behalf thereof;
- other investment, administration or management of financial assets on behalf of other persons;
- savings insurance or insurance services providing for guaranteed regular payout of savings to clients within the framework of insurance companies (holding insurance companies);
- holding of financial assets of other persons (if the client's gross income from holding such assets and the rendering of related financial services makes at least 20% of the client's gross income).

⁵ **Investment Entity** – a legal entity meeting the criteria as follows:

- the Client's gross income is primarily attributable to investing, reinvesting, or trading in financial assets, and
- gross income attributable to the relevant activities equals or exceeds 50% of the Client's gross income during the shorter of: (i) the three-year period ending on 31 December of the year preceding the year in which the determination is made; or (ii) the period during which the Client has been in existence, and
- the Client is managed by another company or legal arrangement that is a Financial Institution.

⁶ **Beneficial Owner (BO)** – a natural person who ultimately owns or controls the legal person Client, through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that person, including through bearer shareholdings, or through control via other means, and holds at least:

- in the form of direct ownership, a shareholding of 25 per cent plus one share or an ownership interest of more than 25 per cent in a company;
- in the form of indirect ownership, in a manner of exercising control whereby a company which is under the control of a natural person holds or multiple companies which are under the control of the same natural person holding a shareholding of 25 per cent plus one share or an ownership interest of more than 25 per cent in a company.

In the case of a trust, civil law partnership, community or legal arrangement, the Beneficial Owner is the natural person who ultimately controls the association via direct or indirect ownership or otherwise and is such associations':

- 1) settlor or person who has handed over property to the asset pool;
- 2) trustee or manager or possessor of the property;

- 3) person ensuring and controlling the preservation of property, where such person has been appointed, or
- 4) the beneficiary, or where the beneficiary or beneficiaries have yet to be determined, the class of persons in whose main interest such association is set up or operates.

⁷ **Politically Exposed Person (PEP)** – a natural person, who in the Republic of Estonia or in foreign countries occupies or has been entrusted with prominent public functions : head of State, head of state administrative unit (chairman of the municipal council, rural municipality or city major), head of government , minister, deputy of minister or deputy of minister's deputy, state secretary or other upper level official in government or state administrative unit (municipality), member of parliament or member of other similar legislative bodies, member of governing bodies (board) of a political party, judge of constitutional court, higher court or judge in a different level court (member of court institutions), member of highest revision (audit) institution council or board, member of central bank's council or board, ambassador, charge affaires, chief officer in the armed forces, member of management or supervisory bodies of State – owned enterprises, Head of an international organization (director, deputy director), and member of the board or a person who is in a similar position in this organization.

⁸ **Family member of a Politically Exposed Person** – a person who is a spouse or a person equivalent to a spouse (a person is deemed equivalent to a spouse only if the laws of the respective country define such status for that person), a child of a politically exposed person, or a child of his/her spouse or a person equivalent to his/her spouse, a spouse or a person equivalent to the spouse of the child of a politically exposed person, a parent, a grandparent, a grandchild, a brother or sister.

⁹ **Person closely connected to a Politically Exposed Person** – an individual having business or other close relationships with a PEP, or who is a shareholder or a member of one and the same commercial company as a PEP, or who is the sole owner of the legal body which has been created in the interests of a PEP.

¹⁰ **International sanctions** – restrictions imposed on the subject of sanctions by the United Nations (UN) or the EU (European Union) or another international organization of which the Republic of Latvia, Republic of Lithuania, Republic of Estonia or Switzerland Confederation are members and which are directly applicable or implemented in the Republic of Latvia, Republic of Lithuania, Republic of Estonia or Switzerland Confederation, in accordance with international law, as well as restrictions adopted by Office of Foreign Assets Control (OFAC).

¹¹ **Goods of strategic significance**, including software and technology, are items that can be used for both civilian and military purposes (Dual-use items). This category includes all goods that can be used in the manufacture of weapons, military equipment, weapons of mass destruction or means of delivery, etc. and are listed in Annex 1 to Council Regulation (EC) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items, Annex 2 to Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, the Common Military List of the European Union, and the National List of Goods and Services of Strategic Significance of the Republic of Estonia