

Counterparty Questionnaire

I. Background information

Full name	ForteBank Joint Stock Company
Short name (if any)	ForteBank JSC
Legal form	Joint stock company
State registration number	-
Country of incorporation	Republic of Kazakhstan
State registration authority	Republic of Kazakhstan Ministry of Justice
Date of registration	Date of first state registration – 13 July 1999, date of latest state re-registration – 10 February 2015
BIN (similar taxpayer identification number)	990740000683
SWIFT, Telex	IRTYKZKA
BIC	IRTYKZKA
Address (registered address)	bldg. 8/1, Dostyk str., Yessil district, Astana city, Z05P1P0/010017, Republic of Kazakhstan
Executive body corporate seat address	bldg. 8/1, Dostyk str., Yessil district, Astana city, Z05P1P0/010017, Republic of Kazakhstan
Postal address	bldg. 8/1, Dostyk str., Yessil district, Astana city, Z05P1P0/010017, Republic of Kazakhstan
Phone numbers, fax numbers, e-mail	+7 7172 59 99 99 fi@fortebank.com; info@fortebank.com
Website	https://forte.kz
Type of the license to perform transactions	License to perform banking and other operations and activities on the securities market
License number	1.2.29/197/36
Date license issued and license period	03.02.2020, perpetual
Issuing authority	Agency for regulation and development of the financial market of the Republic of Kazakhstan
License to perform other activities in the financial market, issued by the authorized body of the State of registration (number, date of issue, period of validity and issuing authority)	
Registered and paid-in capital	Registered: Common shares – 150 003 000 000 Paid-in: Common shares – 92 387 104 089 Capital: 353 001 069 thousand tenge

II. Ownership and management structure

The structure and the name of bodies (the supreme body, the executive body, other bodies) in accordance with the constituent documents	General Meeting Bulat Zhamitovich Utemuratov
Date of the latest revision of constituent documents on the basis whereof the Bank bodies structure is established	Charter dated 28 December 2022

List of members of the counterparty's Board of Directors (independent and other directors) / Supervisory Board

Last name, first name, patronymic (if any)	Citizenship status (country)	Individual Identification Number (if any)	Number, series (if any), date of issue and period of validity of the identity document
Yeldar Abdrazakov – Chairman of the Board of Directors – Independent Director of the Bank			
Anuar Utemuratov – Member of the Board of Directors			
Talgat Kuanyshev – Member of the Board of Directors – Independent Director of the Bank			
Timur Issatayev – Member of the Board of Directors			
Marlen Mirzabekov – Member of the Board of Directors			
Yerlan Ospanov – Member of the Board of Directors			

List of members of the entity's executive board

Last name, first name, patronymic (if any)	Date and place of birth	Citizenship status	Individual Identification Number (if any)	Residence/registration address	Number, series (if any), date of issue and period of validity of the identity document
Bekzhan Pirmatov Member of the Management Board – Chairman of the Management Board		Republic of Kazakhstan		Astana	
Aidyn Auyezkanov – Member of the Management Board – Deputy Chairperson of the Management Board		Republic of Kazakhstan		Astana	

Gaukhar Bissembiyeva – Member of the Management Board – Deputy Chairperson of the Management Board		Republic of Kazakhstan		Astana	
Amyrkhan Chikanayev – Member of the Management Board – Deputy Chairperson of the Management Board		Republic of Kazakhstan		Astana	
Ravshan Irmatov – Member of the Management Board – Deputy Chairperson of the Management Board (CFO)		Republic of Kazakhstan		Astana	
Astan Sagitov – Member of the Management Board – Managing Director (Chief SME Officer)		Republic of Kazakhstan		Astana	

Personal composition of other management bodies (if any)

Last name, first name, patronymic (if any)	Citizenship status	Individual Identification Number (if any)	Number, series (if any), date of issue and period of validity of the identity document

Entity representatives (if any)

Last name, first name, patronymic (if any)	Citizenship status	Individual Identification Number (if any)	Number, series (if any), date of issue and period of validity of the identity document

Number, date and period of validity (if any) of the document (order, power of attorney) empowering the representative to perform legal acts on behalf of the legal entity (opening of account, maintenance of account, full name (if any) of the person signing the document (order, power of attorney) empowering the representative to perform legal acts on behalf of the legal entity):

III. Please provide information on shareholders (participants) holding the shares (participation interest) of 5% and over, disclosing the structure of capital of those shareholders (participants) and beneficial owners thereof.

Name/full name of the shareholder (participant)	Share in capital	Address/Registration address	Full name, date and place of birth of the beneficial owner, participation interest (%)
	81.82%	Republic of Kazakhstan	Bulat Utemuratov
	7.50%	Republic of Kazakhstan	Alidar Utemuratov

IV. Beneficial owners ¹ full name of the beneficial owner	Participation interest (expressed in %)
Annex 1 "Information on a beneficial owner" to be completed with regard to each beneficial owner	
Bulat Zhamitovich Utemuratov	81.82%

Please specify if the persons specified in the management/ownership structure are public officials² or spouses, close relatives of such a person (hereinafter – PO)?

Pirmatov Bekzhan Olzhayevich- brother Pirmatov Galymzhan Olzhayevich was the Chairman of the NBRK until September 4, 2023.

V. Please state your principal Correspondents and Counterparties

The list of ForteBank JSC principal correspondent banks disclosed on the website:
<https://business.forte.kz/service/correspondent-relations>

Name	SWIFT	Place of business (country, city)

VI. Is your bank a branch, a subsidiary or a dependent company?

☐ Yes

☒ No

If yes, please state the parent organization and address thereof (registered office)

VII. Does your entity have branches and representative offices, subsidiaries and dependent companies?

☒ Yes

☐ No

If yes please state them

Name and core activities	Registered office (full address)	Full name of the CEO
OUSA Alliance LLP The core activities: acquisition of doubtful and bad claims of the parent bank, as well as management thereof	Bldg. 2A, Auezov ave., Almaty city, Republic of Kazakhstan	Yerzhan Akhilbayev
OUSA-F LLP The core activities: acquisition of doubtful and bad claims of the parent bank, as well as management thereof	Bldg. 32, Kunayev str., Almaty city, Republic of Kazakhstan	Assel Niyetkaliyeva
Forteleasing JSC Leasing activity	Bldg. 502, Seifullin ave., Almaty city, Republic of Kazakhstan	Talap Rakhmanov
«One-Technologies» LLP IT Activities	Bldg. 155, Tazhibaeva str., Almaty city, Republic of Kazakhstan	Zhaparov Almat
AO «ForteFinance» Brokerage activity	Bldg.46/201, Sauran str., Astana city, Republic of Kazakhstan	Dautbayev Asyl

No.	Branch name	Legal address
1	Branch in Almaty city	Bldg. 100, Nazarbayev ave., Almaty city
2	Branch in Astana city	Bldg. 8A Dostyk str., Astana city

¹ A Beneficial owner is an individual who directly or indirectly holds over twenty-five per cent of participation interest in charter capital, or outstanding shares (net of preference shares and shares repurchased by the company) of the customer being a legal entity; as well as an individual otherwise exercising control over the customer, or on behalf whereof the customer performs transactions with money and (or) other assets

² As defined in the Republic of Kazakhstan Law "On combating legalization (laundering) of profits obtained by illegal means and the financing of terrorism"

3	Branch in Aktau city	Bldg. 22/2, microdistrict 12, Aktau city
4	Branch in Aktobe city	Bldg. 85, Abylkair Khan ave., Aktobe city
5	Branch in Atyrau city	Bldg. 155, Pushkin str., Atyrau city
6	Branch in Karaganda city	Bldg. 49/1, Gogol str., Karaganda city
7	Branch in Kaskelen town	Bldg. 76A, Abylai Khan str., Kaskelen town
8	Branch in Kokshetau city	Bldg. 108/1, Abai str., Kokshetau city
9	Branch in Kostanai city	Bldg. 155/1, Təuelsizdik str., Kostanai city
10	Branch in Kyzylorda city	Bldg. 8A, Sultan Beibars str., Kyzylorda city
11	Branch in Pavlodar city	Bldg. 46/1, Toraigyrov str., Pavlodar city
12	Branch in Petropavlovsk city	Bldg. 21, K. Sutyushev str., Petropavlovsk city
13	Branch in Semey city	Bldg. 15A, Kayym Mukhamedkhanova str., Semey city
14	Branch in Taldykorgan city	Bldg. 136, Gagarin str., Taldykorgan city
15	Branch in Taraz city	Bldg. 161, Kazybek Bi str., Taraz city
16	Branch in Uralsk city	Bldg. 35 B, Zh. Moldagaliyev str., Uralsk city
17	Branch in Ust-Kamenogorsk city	Bldg. 68, Kazakhstan str., Ust-Kamenogorsk city
18	Branch in Shymkent city	Bldg. 15A, Zheltoksan str., Shymkent city
19	Branch in Ekibastuz city	Bldg. 57A, Mashhur Zhussip str., Ekibastuz city
20	Branch in Turkestan city	Bldg. 339, Tauke Khan str., Turkestan city

VIII. Name and registered office of the financial group/holding company your organization belongs to (if any)

«Nova Leasing» JSC is a banking holding of «ForteBank» JSC. Mr. Utemuratov B. Zh. is a 100% shareholder of «Nova Leasing» JSC. Address of «Nova Leasing» JSC: 8/1 Dostyk str., Astana city, Republic of Kazakhstan

IX. Describe (in general) the history of your organization, business reputation, specialization in banking products, information on occupied sector of the market and business competition, restructuring, changes of the nature of activities, etc.:

ForteBank Joint Stock Company is one of the leading Kazakhstan banks and has been successfully operating in the banking services market for more than 20 years.

As of 1 October 2023, ForteBank JSC ranks fourth* in the country in terms of assets, and is developing as a universal financial institution in all areas of business.

As of 30 October 2023, Bulat Utemuratov is a beneficial owner of 81.82% of the Bank's common shares, of which: 77,18% are represented as placed common shares of the Bank and 4,64% of the shares (including common shares and GDRs, the underlying asset whereof is represented by common shares of the Bank) are owned through Nova Leasing JSC.

ForteBank JSC is a participant of:

- compulsory deposit guarantee system Kazakhstan Deposit Insurance Fund JSC;
- Kazakhstan Stock Exchange (KASE);
- Financial Institutions' Association of Kazakhstan;
- S.W.I.F.T. International Interbank Telecommunication Systems;

and

- Member of Atameken National Chamber of Entrepreneurs;
- Principal member of VISA International and MasterCard International payment systems;
- Partner of Damu Development Fund.

ForteBank JSC has an extensive branch network which amounts to 20 branches and about 98 outlets, as well as an extensive network of acquiring devices amounting to about 713 ATMs and 15 629 POS terminals in trade and service enterprises.

** the rating was compiled on the basis of data from the National Bank of the Republic of Kazakhstan on the commercial banking sector with the exception of JSC "Otbasy Bank"*

X. Please state the organization rating assigned by international rating agencies:

Standard & Poor's International Rating Agency ratings:

- Long-term credit rating: "BB-"
- Short-term credit rating: "B"
- National scale rating: "kzA-"
- Outlook: "Stable"

Moody's Investors Service International Rating Agency ratings:

- Local and foreign currency long-term deposit rating: "Ba2"
- Outlook: "Positive"

Fitch Ratings International Rating Agency:

- Long-term issuer default rating: "BB"
- Short-term issuer default rating: "B"
- National long-term rating: "A(kaz)"

Outlook: "Stable"

XI. Supervisory authority in the country of the entity, frequency of reviews performed thereby

Agency for regulation and development of the financial market of the Republic of Kazakhstan. Address: bldg. 21, Koktem-3 microdistrict, Almaty city, Republic of Kazakhstan, 050040. The scheduled inspection is carried out in accordance with the inspection plan, not often than once a year.

XII. Name of the external audit firm to audit the reliability of the financial statements of the entity, stating the date of the last audit

Ernst & Young LLP, date of the latest audit – 31.12.2022.

XIII. State an Internet resource that hosts the official financial statements of the entity for the last reporting period (balance sheet, income statement)

<http://www.kase.kz>
<https://forte.kz/reporting>

XIV. Organizing a system for combating legalization (laundering) of profits obtained by illegal means, financing of terrorism and financing of proliferation of weapons of mass destruction, as well as for compliance with the international sanctions.

1) In your country, is your entity the subject of AML/CFT law enforcement?

☒ yes

☐ no

If yes, please state the AML/CFT legislative and other statutory acts adopted in your country:

- Law of the Republic of Kazakhstan dated August 28, 2009 No. 191-IV "On Counteracting the Legalization (Laundering) of Criminally Obtained Incomes and Financing of Terrorism";
- Republic of Kazakhstan Financial Monitoring agency Order No. 13 dated 22 February 2020 "On Approval of the Rules for the Submission by Subjects of Financial Monitoring of Data and Information on Transactions Subject to Financial Monitoring and Signs of Identifying a Suspicious Transaction";
- Republic of Kazakhstan National Bank Management Board Resolution No.188 dated 12 November 2019 "On Approval of the Rules for Formation of a System to Manage Risks and Internal Control for Second-tier Banks";
- Republic of Kazakhstan Code No.235-V dated 5 July 2014 "On Administrative Offenses";
- Republic of Kazakhstan National Bank Management Board Resolution No. 18 dated 22 March 2020 "On the establishment of the List of offshore zones for the purposes of banking and insurance activities, the activities of professional participants in the securities market and other licensed activities in the securities market, the activities of joint-stock investment funds and the activities of organizations carrying out microfinance activities";
- Republic of Kazakhstan National Bank Management Board Resolution No.8 dated 24 February 2020 "On Approval of the List of Offshore Zones for the Purposes of Republic of Kazakhstan Law 'On Combating Legalization (Laundering) of Illegally Gained Income and Financing of Terrorism'";
- Republic of Kazakhstan Minister of Finance Order No.613 dated 4 December 2015 "On Approval of the Rules for Payment of Funds to an Individual Included in the List of Entities and Those Associated with the Financing of Terrorism and Extremism, for Life Support";
- The Agency of the Republic of Kazakhstan for Regulation and Development of Financial Market Order No. 6 dated 9 August 2021 "On approval of requirements for financial monitoring entities for training and education in the field of combating legalization (laundering) of proceeds from crime and financing of terrorism".
- Republic of Kazakhstan National Bank Management Board Resolution No.140 dated 29 June 2018 "On Approval of Requirements for Customer Due Diligence in case of Remote Establishment of Business Relations by Financial Monitoring Subjects".

2) Has your entity developed rules of internal controls for AML/CFT, as well as regulations on AML/CFT issues, and the programs of implementation thereof in accordance with the requirements of national legislative acts and other statutory acts?

☒ yes

☐ no

If yes, please state them:

Name of the statutory act	Date of approval and date of last amendments made
"Policies to Combat Legalization (Laundering) of Illegally Gained Income and Financing of Terrorism"	26 May 2016 (with amendments as of 29 September 2023)
"Rules for Combating Legalization (Laundering) of Illegally Gained Income and Financing of Terrorism"	23 April 2018 (with amendments as of 27 April 2023)
"Instruction on financial monitoring of the Compliance Control Service"	01 February 2017 (with amendments as of 24 May 2023)
"Procedure for identifying unusual operations"	29 August 2018 (with amendments as of 07 June 2022)
"Rules for working with international sanctions"	26 December 2018 (with amendments as of 14 February 2023)
"Rules for interaction with persons entrusted with the application of customer due diligence"	28 June 2019 (with amendments as of 14 June 2022)
"Procedure for managing changes and maintenance of the AML Financial Monitoring System"	27 June 2018 (with amendments as of 30 May 2022)

2-1) Are the rules for internal control for the purposes of AML/FT/FPWMD in compliance with the requirements of the law and recommendation of FATF (Financial Action Task Force)?

☒ yes

☐ no

3) Has your entity developed procedures involving the following:

identification of customers and beneficial owners thereof; establishment and identification of beneficiaries; study of customers and counterparties of your entity

☒ Yes

when making transfers, provision of full information on the sender (account number, name, full address)	Yes
when making international transfers, receipt of full information on the beneficiary (account number, name, full address)	Yes
identification of the person when transactions with money or other assets are conducted thereby without the use of a bank account	Yes
checking of customer information and transactions made thereby, as well as determination of the source of customer's funds	Yes
checking of customer, representative, participants and beneficiary owner thereof against the sanction lists (international sanction)? If yes, what sanction lists does your entity use?	Yes International lists: US OFAC, UN, EU, UK HMT.
checking of customers, representatives and beneficiary owners thereof during onboarding/service against the list of entities and private individuals involved in extremist activity or terrorism and proliferation of weapons of mass destruction?? If yes, what lists does your entity use?	Yes Lists of Agency of Financial Monitoring: -List of individuals and organizations, linked with financing terrorism and extremism; -List of individuals and organizations, linked with spread of weapon of mass destruction; -List of individuals, involved with terrorist activities;
identification of transactions stipulated by the legislation on AML/CFT	Yes
monitoring of unusual or suspicious activity related to transfer of money or other means of payment (such as checks, payment documents, etc.)?	Yes
regulation of establishing business relations with public officials?	Yes
management of the risks of legalization (laundering) of illegally gained income and financing of terrorism, with due account for risk factors (customer type risk, country (geographical) risk, service (product) risk)?	Yes

setting of heightened measures of due diligence for the relevant categories of customers and groups of transactions, which, in the opinion of your entity, are associated with an increased risk of illegal operations within or through your entity?	Yes
processes of review and, if necessary, updating of information on high-risk customers?	Yes
documented recording and submission of information required by national legislation on AML/CFT to the authorized body	Yes
documents and information storage	Yes
bringing to the attention of relevant employees of the information on changes in the AML/CFT legislation or internal control procedures?	Yes
procedures to prevent opening of anonymous accounts?	Yes
has your entity developed procedures hindering the establishment of correspondent relations with shell banks?	Yes
staff training on AML/CFT (periodicity of training and date of the latest one)	<p>Yes</p> <p>The training is performed for all new employees within a month from start of work. For everyone else - at least once a year.</p> <p>Additional training activities are conducted in case of changes of the Republic of Kazakhstan legislation on AML/CFT, the Bank rules and procedures applicable to internal control for AML/CFT purposes.</p> <p>Date of the latest training – July 2023.</p>
refusal to onboard the customers with certain customer operation types, industries and production segments? please specify the prohibited industries	No
international sanctions handling procedures?	Yes

4) Does your entity have an automated information system to facilitate detection of suspicious activity (operations) performed by customers?

☒ yes

☐ no

If yes, please state which software is used

Financial Monitoring System "AML v 2.0" software

5) How does your entity inspect customers in the database for sanction and other lists (automatically or manually)?

Automatically

If automatically, which software is used for this (name of the software and developer), and since when is this software used?

Financial Monitoring System "AML v 2.0" software developed by Prime Source Innovation LLP. The Bank has been using the system since 14 March 2013.

6) How does your entity conducts verification of the object of payment (cross-border payments) to identify any sanction prohibitions?

Automatically

If automatically, which software is used for that purpose (software and developer name), and since when have you been using that software?

Financial Monitoring System "AML v 2.0" software developed by Prime Source Innovation LLP. The Bank has been using the system since 14 March 2013.

7) Does your entity use external systems for review of sanctions (e.g., Worldcheck / Dow Jones Risk & Compliance Services)? State the name. If the review for sanctions is performed in the manual mode, which specialized websites/external systems are used?

Dow Jones Risk & Compliance, EU Sanctions Map, OFAC Sanctions List Search, UN List, UK Sanctions List Publication

8) Does your entity provide services to customers subject to the following criteria?

Customer type	Answers		Total number of customers (%)
	Yes	No	
public officials, their spouses and close relatives, as well as the entities where such persons are beneficiary owners;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0,1% (1193)
non-residents	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,07%(13224)
foreign financial institutions;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
legal entities and individual entrepreneurs the business whereof is connected with intensive cash turnover, including:	<input type="checkbox"/>	<input type="checkbox"/>	
legal entities exclusive activity whereof is arrangement of exchange transactions with foreign currency in cash	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0,10% (173)
entities exclusive activity whereof is collection of banknotes, coins and valuables	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
microfinancing institutions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0,31% (534)
legal entities registered as pawn shops	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0,13% (221)
agents (attorneys) of service providers (other than financial ones) that receive cash from consumers, including through electronic terminals	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,58% (2720)
gambling business promoters, as well as those providing services or receiving profit from online casinos outside the Republic of Kazakhstan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
those providing tourist services, as well as other services related to the intensive cash turnover	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0,43% (741)

broker dealers managing the investment portfolio (exclusive of subsidiaries of the Counterparty which comply with the AML/CFT requirements set by the Counterparty)		No	
insurance (reinsurance) organizations, insurance brokers engaged in "life insurance" (exclusive of subsidiaries of the Counterparty which comply with the AML/CFT requirements set by the Counterparty)	Yes		0,005% (9)
those providing services on financial leasing (exclusive of subsidiaries of the Counterparty which comply with the AML/CFT requirements set by the Counterparty)	Yes		0,02%
credit cooperatives;		No	
those operating as insurance agents;	Yes		0,005% (9)
those carrying out mediation activities in purchase and sale of real estate;	Yes		0,17% (292)
those the activities whereof are related to production and (or) trade in weapons, explosives;	Yes		0,006% (10)
those the activities whereof are related to extraction and (or) processing, purchase and sale of precious metals, precious stones or wares thereof;	Yes		0,08% (144)
non-profit organizations in the legal form of foundations, religious associations;	Yes		0,05% (91)
entities related to the adult entertainment industry (Red Light business, Adult Entertainment)		No	
entities conducting transaction/deals with digital assets		No	
those located (registered) in the Republic of Kazakhstan, branches and representative offices thereof located in the Republic of Kazakhstan, as well as in the countries transactions wherewith increase the risk of money laundering/financing of terrorism, including the following: 1) foreign countries (territories) included in the list of countries (territories) not fulfilling or insufficiently fulfilling the recommendations of Financial Action Task Force on Money Laundering (FATF) as prepared by the authorized body on financial monitoring; 2) foreign countries (territories) in respect whereof international sanctions (embargo) as adopted by the UN Security Council resolutions are applied; 3) foreign countries (territories) included in the list of offshore zones for the purposes of the Republic of Kazakhstan Law "On Combating Legalization (Laundering) of Illegally Gained Income and Financing of Terrorism" in accordance with the Decree of the Board of the Agency for Regulation and Development of the Financial Market of the Republic of Kazakhstan No. 8 dated February 24, 2020 "On the Establishment of a List of Offshore Zones for the Purposes of Banking and Insurance Activities, the Activities of Professional Participants in the Securities Market and Other Licensed Types of Activities in the Securities Market, the Activity of the Joint Stock Investment Funds, and the Activity of the Organizations Carrying Out Microfinance Activities"; approved by Republic of Kazakhstan Acting Minister of Finance Order No.52 dated 10 February 2010 "On Approval of the List of Offshore Zones for the Purposes of the Republic of Kazakhstan Law 'On Combating Legalization (Laundering) of Illegally Gained Income'"; 4) foreign countries (territories) determined by the Counterparty as representing a high risk of ML/FT on the basis of other factors (information on corruption level, illicit production, drug trafficking and (or) transit, information about support of international terrorism).	Yes		0,17% (2128)

9) What is the percentage of high-risk customers your entity has a business relationship with:

Less than 1%

10) Please specify when does a customer's monetary funds source request takes place?

Within enhanced due diligence and in cases of suspicious transactions

11) Does you entity use any third parties to perform customer identification procedures?

☐ yes

☒ no

If yes, please specify the entity's name and the procedures it performs.

12) Are the internal control rules and programs developed by your parent organizations for the purpose of AML/CFT applied to foreign subsidiaries and dependent companies, branches (representative office) of your entity (if any)?

☒ yes

☐ no

13) Are there procedures for assessment by internal audit department and external audit organization of the effectiveness of internal documents on AML/CFT

☒ yes

☐ no

If yes, please state the date and the results of the last audit and attach the results of the external audit organization

Internal audit: 12 July 2021

External audit: Ernst&Yong – business consulting LLP, the latest audit was conducted in August 2022.

14) Name the subdivision performing the functions in AML/CFT area (if any)

Compliance Control Service

15) Please specify the number of the AML/FT division employees?

23

16) Please specify the total number of customers as of the last reporting date

1 238 534 (as of 30.09.2023)

17) Please specify the number of customers by legal entity/private individual/financial institution as of the pas reporting date (%)

7.68%/91.82%/0.004% (as of 30.09.2023)

18) Please specify the number of loro respondent customers, providing company (end-to-end calculations)

19) Please specify the number of risk level assigned to the customers and frequency of revision of the customer risk levels

1) critically high – at least once every half a year;

2) high – at least once a year;

3) average – at least once every two years;

4) low – at least once every five years.

20) Please specify when does your entity implement enhanced customer due diligence?

enhanced due diligence measures are carried out in the following cases:

- when assigning a high level of AML/CFT risk to the client;**
- when a suspicious transaction (transaction) or an attempt to commit it is detected in the process of monitoring and observing of the client's operations;**
- if there are doubts about the reliability of the information provided by the client;**
- by the decision of the Chief Compliance Controller.**

21) Please specify is the customer risk level calculation algorithm is automated?

☒ yes

☐ no

22) Specify the direction of your business in relation to countries (TOP 5 countries in terms of cross-border payments):

24) Please specify the number of customers registered in a country different from the country of registration of your entity (transit customers) and what % of them is in the customer base?

1.07%

25) Do you provide service to the customers without an account?

☒ yes

☐ no

If yes, please specify the services provided and the means of identifying such customers

Inter-branch transactions, transfers of Zolotaya Korona and exchange transactions for which it is necessary to provide identity documents.

26) Please specify the countries subject to any prohibitions regarding customer service/payments and other settlements (upon registration/location of a customer or a representative/participant/beneficiary owner/payment participant thereof)

Iran, North Korea, Myanmar (Burma), Syria.

27) Do you offer any services related to the digital currencies?

☐ yes

☒ no

If yes, please describe the verification procedure you use (for example, during onboarding, identification/verification of a customer and the beneficiary owners, so that you could monitor the digital assets transactions, etc.)

28) Do you render any services to the entities/customers that deal with / are related to any operations with the virtual/digital assets?

☐ yes

☒ no

If yes, what are these services and what measures do you implement to decrease the ML/FT risk?

29) Does your legislation stipulate relevant requirements for registration of procedures that allow, upon request of the Bank, providing information on due diligence of your customers?

☒ yes

☐ no

30) Does any authorized state body exercise control over your entity for application of AML/CFT requirements?

☒ yes

☐ no

If yes, please state the full name, address and website link of your authorized state body for AML/CFT:

Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, address: 21 Koktem-3 microdistrict, Almaty, Republic of Kazakhstan. <https://www.gov.kz/memleket/entities/ardfm?lang=ru>

31) State the date and results of the last AML/CFT inspection carried out by the supervisory authority in the country of your entity

Based on the results of the latest audit conducted by the Agency of the Republic of Kazakhstan for the regulation and development of the financial market (hereinafter referred to as the ARDFM) in 2020, individual violations of the deadline for providing statistical information on transactions to the authorized body were detected. The identified deficiencies were caused by a technical failure of the system and are not a violation of the legislation on combating the legalization (laundering) of proceeds from crime and the financing of terrorism. All comments have now been corrected.

32) Have the supervisory authorities applied any enforcement actions to your entity in connection with non-fulfillment of the AML/CFT legislation for the last five years?

☒ yes

☐ no

If yes, please disclose the information in detail

The ARDFM did not apply any supervisory response measures in respect of the Bank under the AML/CFT Law. At the same time, the Bank was brought to administrative responsibility.

1. In 2020, The ARDFM drew up protocols on administrative offense. The Bank appealed against all protocols in court and by the decision of the court of first instance the protocols were canceled, administrative proceedings were terminated for lack of corpus delicti in the Bank's actions.

At the request of the Nur-Sultan city Prosecutor's Office, the court decisions were reviewed on appeal. The Bank appealed the court decisions in the Supreme Court of the Republic of Kazakhstan. Currently, the overpaid amounts of the fine have been returned to the Bank.

At present all remarks of the Agency of the Republic of Kazakhstan on Regulation and Development of Financial Market have been eliminated.

2. In 2023 - The ARDFM drew up protocols on administrative offense. The Bank appealed all protocols in court. Due to the Bank's disagreement with the court decision, in September 2023, the Bank filed a petition to the Supreme Court of the Republic of Kazakhstan to review the rulings of the court of first and appellate instances in cassation. The Supreme Court accepted the Bank's application for consideration.

33) Have you appointed an employee responsible for compliance with the rules of internal control for the purpose of AML/CFT and implementation programs thereof?

☒ yes

☐ no

If yes, please state his (her) last name, first name and patronymic (if any), position, contact telephone numbers and fax numbers, e-mail address:

Full name:

Nazhmidenov Birzhan

Position:

Chief Compliance Officer

Phone:

+7 7172 59-99-99 (ext. 10808)

E-mail:

cs@fortebank.com

XV. Information related to FATCA (Foreign Account Tax Compliance Act)

Basic information	Answers	
	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is your entity a US resident for tax purposes?		<input type="checkbox"/> No
Are you registered on IRS website?	<input type="checkbox"/> Yes	
GIIN:	LPSQS3.99999.SL.398	
Participation type: (Please provide the W-8BEN-E/W-9 questionnaire)	Reporting Model 1 FFI	
Does your entity perform activities within compliance with FATCA:	<input type="checkbox"/> Yes	<div data-bbox="799 631 1386 779" data-label="Text"> <p>If yes, please state which ones:</p> <p>The Bank is registered on the IRS website and conducts activities in the context of identification of those (accounts thereof) falling within the FATCA requirements</p> </div>
FATCA Responsible Officer	<div data-bbox="799 779 1386 1066" data-label="Text"> <p>last name, first name and patronymic (if any):</p> <p>Nazhmidenov Birzhan</p> <p>Position: Chief Compliance Officer</p> <p>Contact number, e-mail:</p> <p>+7 7172 59-99-99 (ext. 10808)</p> <p><u>cs@fortebank.com</u></p> </div>	

Authorized to sign on behalf of the entity

Head of Compliance Control Service

Director
International Relations

Indira Baydarakova

Daurzhan Augambay

Stamp here



“ 17 ” November 20 23 (date)

Information on Counterparty's Beneficial Owner
BIN 990740000683

Full name	Bulat Utemuratov
Date and place of birth (country)	13.11.1957
Citizenship status (if any)	The Republic of Kazakhstan
Individual identification number (if any)	
Number, series (if any), name of the authority issuing the identity document, date of issue and period of validity	
Tax residence, including taxpayer's number in the foreign country	
Registration address/address of residence (if available)	
Contact telephone number	
State whether the beneficial owner is affiliated with public officials or their spouses or close relatives	Not applicable
The basis whereupon an individual is recognized as a beneficial owner	<input checked="" type="checkbox"/> An individual that holds, directly or indirectly, over 25% of participation interest in the charter capital, or outstanding shares (net of preference shares and shares repurchased by the company) of the legal entity; <input type="checkbox"/> An individual exercising control over the legal entity on other grounds <input type="checkbox"/> An individual for the benefit whereof the legal entity establishes business relationship (conducts transactions)

Director
International Relations

Head of Compliance Control Service



Daurzhan Augambay

Indira Baydarakova

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“ 17 ” November 2023 (date)

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“ ” 20 (date)