FINCI Services:

Impact of actual sanctions against Russian Federation (RUS) and the Republic of Belarus (BLR)

07.2023.

Firstly, our thoughts are with all those affected by the current situation in Ukraine (UKR). We hope there is a swift end to this crisis.

FINCI complies with United Nations (UN), European Union (EU), United States of America (USA), United Kingdom (UK) and national sanctions. This also includes sanctions against Russian Federation (RUS) as a result of its actions towards Ukraine (UKR). Plus, sanctions announced also against the Republic of Belarus (BLR). Please note, these sanction regimes are subject to change, which may further affect FINCI services.

In light of the above, we would like to draw your attention to the following:

- FINCI will not execute or accept any payments directly or indirectly related to sanctioned subjects, regions, territories or other actual restrictions.
- Payments (including incoming and outgoing) can take longer than usual to be processed, especially when the payments are related to Russia, Belarus or in the vicinity of territories subjected to sanctions.
- In order to ensure the smooth execution of your payments, we kindly ask you to plan your payments in advance and to be prepared to provide all necessary related supporting documents and further information upon FINCI's request.
- FINCI has the right to terminate its business relationship with sanctioned clients, including in cases where there are reasonable grounds to suspect that clients are in breach of or evading sanctions.
- FINCI will consider opening an account for Russian citizens only if the person has a temporary or permanent residence permit or citizenship issued in a Member State or a country that is a member of the European Economic Area (EEA) or Switzerland (CHE). Each case is assessed on an individual basis, considering the requirements of actual international sanctions and money laundering and terrorism.

This is, of course, a fluid situation. Sanction rules can change at short notice. So FINCI may take additional steps to ensure all applicable sanctions are complied with.

More information on international sanctions can be found on the websites below:

- Ministry of Foreign Affairs of the Republic of Lithuania: Tarptautinių sankcijų įgyvendinimas | Lietuvos saugumo politika | Lietuva regione ir pasaulyje | Užsienio politika | Lietuvos Respublikos užsienio reikalų ministerija (<u>https://www.urm.lt/default/lt/</u>)
- UN sanctions: <u>https://www.un.org/securitycouncil/content/un-sc-consolidated-list</u>
- EU sanctions map: <u>https://www.sanctionsmap.eu/#/main</u>
- US (OFAC) sanctions: <u>https://home.treasury.gov/policy-issues/office-of-foreign-assets-control sanctions-programs-and-information</u>
- UK sanctions: <u>https://www.gov.uk/government/organisations/office-of-financial-sanctions implementation</u>

If you have any questions or concerns, we're here to help. Please contact our customer support team on +370 691 106 93