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SECURITIES CUSTODY CHAIN AND OMNIBUS ACCOUNT STRUCTURE

PURPOSE AND SCOPE

This document maps the custody and settlement chain involving SPB Bank and T-Investment (acting in its capacity as a broker), and describes the associated omnibus account architecture. The scope is strictly limited to the account structures and relationships relevant to OFAC’s review of the main application.

The information provided reflects the arrangements in effect as of _____, and is supported by the documentation referenced in the main application. Any unverified relationships or gaps in the available account data are expressly identified herein.

CUSTODY AND SETTLEMENT CHAIN – ENTITY MAPPING

CHAIN LEVEL	ROLE	DESIGNATION
Investor / End-Client	Beneficial owner of the securities	non-SDN
↓		
T-Bank JSC T-Invest Lab LLC Formerly known as Tinkoff JSC	Client onboarding and account administration, order execution or routing, client-level securities recordkeeping, reporting and coordination with downstream custody and settlement intermediaries	SDN
↓		
SPB Bank JSC SPB Exchange JSC	Maintains omnibus securities accounts, securities recordkeeping, transaction processing, settlement coordination and asset servicing, facilitates access to upstream custodians and market infrastructure	SDN
↓		
(1) The Bank of New York Mellon SA/NV (2) Freedom Finance Europe Ltd. (3) GTN Middle East (DIFC) Limited (4) Euroclear Bank S.A./N.V.	As applicable: upstream custody, safekeeping, securities account maintenance, clearing/settlement, and asset servicing through the omnibus custody infrastructure	non-SDN

* Sanctions status is provided for entity-identification purposes only and does not constitute a determination of the blocking status of any particular account or security.
* Upstream custodians function through an omnibus custody infrastructure that is not controlled by the beneficial owner of the assets.
* The beneficial owner is not an authorized signatory on the upstream omnibus accounts and cannot issue instructions directly to the institutions maintaining those accounts.

	THE APPLICANT / BENEFICIAL OWNER
Signature	
Full Name	
Date	[DD.MM.YYYY]