

# CLIENT QUESTIONNAIRE

AS Citadele banka Lithuanian branch, Branch code 304940934  
Upes St 21-1, LT-08128, Vilnius, Lithuania

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 residency <sup>1</sup>

Please list all tax residency countries and taxpayer identification numbers

Country	Taxpayer identification numbers



**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 (How much per month you plan to receive in the account(-s))	Outgoing payments (How much per month you plan to transfer from the account(-s))
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"/>
If the amount exceeds 700,000, please specify the amount			
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 (How much per month you plan to pay into the account(-s))	Cash withdrawal (How much per month you plan to withdraw from the account(-s))
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 owners<sup>6</sup>, representatives, shareholders****Does the legal entity have beneficial owners<sup>6</sup> other than tax residents<sup>2</sup> of the Republic of Lithuania?** **No**       **Yes, please specify**

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

**Does the legal entity have beneficial owners<sup>6</sup>/ representatives/ shareholders who are politically exposed person <sup>7</sup>, family member of a politically exposed person <sup>8</sup>, or person closely associated to a politically exposed person <sup>9</sup>?** **No**       **Yes, please specify**

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

---

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

Reason	Explanation
<input type="checkbox"/> Employees in Lithuania	
<input type="checkbox"/> Business in Lithuania	
<input type="checkbox"/> Real estate in Lithuania	
<input type="checkbox"/> Business partners in Lithuania	
<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 sanctions<sup>10</sup>, 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 countries<sup>10</sup>.*

*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 Personal Data Processing Principles available at [www.citadele.it](http://www.citadele.it).*

*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 .....

**<sup>1</sup> 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.

**<sup>2</sup> 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).

**<sup>3</sup> 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.

**<sup>4</sup> 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).

**<sup>5</sup> 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.

**<sup>6</sup> Beneficial Owner (BO)** – a natural person who owns or controls the customer (legal entity or foreign state-owned enterprise) and / or the natural person on whose behalf the transaction or activity is performed. The beneficiary is:

- 1) in a legal person: (a) a natural person who owns or controls, directly or indirectly, a sufficient percentage of the shares or voting rights of that legal person, including through the management of bearer shares, except in the case of public limited liability companies, which are subject to disclosure requirements in accordance with European Union law, or equivalent international standards, or otherwise controlled. A natural person who owns 25 per cent and one share or more than 25 percent of the client's property is considered a direct owner. The natural person (s) controlling the company or several companies that owns 25 percent and one share or more than 25 percent of the client's ownership is considered to be the indirect owner(s). ; (b) a natural person in a senior management position, if the person referred to in point (a) of this paragraph has not been identified or if there are doubts as to whether the identified person is the beneficiary;
- 2) in trusts, all of the following: (a) a trustee; (b) a trustee; (c) the custodian, if any; (d) a natural person who benefits from a legal person or entity without legal personality or, in the absence of such a person, from persons whose

interests that legal person or entity without legal personality has established or operates; (e) another natural person who effectively controls the trust is owned, directly or indirectly, by other means;

- 3) in a legal person administering and distributing funds, in an entity of a form similar to a trust, a natural person holding a position equivalent to the duties specified in Paragraph 2 of this Part.

**<sup>7</sup> Politically Exposed Person (PEP)** – are natural persons who have or have been entrusted with important public duties and their close family members or close assistant: Head of State; Head of Government; Minister, vice-minister or deputy minister; Secretary of State, chancellor to the parliament, government or ministry; Member of the parliament; Member of the Supreme Court, Constitutional Court or other supreme judicial authority whose decisions cannot be appealed against; Mayor of municipal government; Director of municipal administration; Head of an international intergovernmental organisation, its deputy head, member of its governing or supervisory body; Leader of a political party, its deputy leader, member of its governing body; Member of the governing body of the supreme state audit and control authority; Chairperson, deputy chairperson or member of the board of the central bank; Ambassador, chargé d'affaires, Commander of the Lithuanian Armed Forces, Commanders of the Armed Forces and Units, Chief of the Defense Staff or a high-ranking officer of the Armed Forces of foreign states; Member of the governing or supervisory body of state enterprise, public limited liability company, private limited liability company whose shares or part thereof, granting more than 1/2 of all votes in the general meeting of shareholders, are owned by the state; Member of the governing or supervisory body of municipal enterprise, public limited liability company, private limited liability company whose shares or part thereof, granting more than 1/2 of all votes in the general meeting of shareholders, are owned by the municipal government, and which are considered large enterprises according to the Law on Financial Reporting by Undertakings of the Republic of Lithuania.

**<sup>8</sup> Family member of a politically exposed person** – the spouse, the person with whom the partnership is registered (hereinafter - cohabitant), parents, brothers, sisters, children and spouses of children, cohabiting children.

**<sup>9</sup> Person closely associated to politically exposed person:**

- 1) a natural person who is a member of the same legal person or an organization without legal personality or maintains other business relations with a person holding or having held the duties;
- 2) a natural person who is the sole beneficiary of a legal person or an organization without legal personality, established or operating for the de facto property or other personal benefit of a person holding or having performed the duties.

**<sup>10</sup> 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).

**<sup>11</sup> 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 Lithuania.