

Considering the fact that bank accounts maintained by Bank Handlowy w Warszawie S.A. (the "Bank") may not be used for the purpose of processing transactions subject to international sanctions, including those imposed by the United Nations, the European Union and the United States of America. Information concerning the nature and scope of the applicable sanctions is presented below.

Sanctions covered by the Bank's documentation include:

1. Sanctions imposed by the European Union ("EU"), which form part of the EU regulations additionally implement to the EU legal framework - sanctions appearing under the aegis of the United Nations ("UN") - on a regular basis. A link to sanctions list and sanction programs of the EU along with a list of effective Council Regulations can be found below. Restrictive measures imposed by the EU may target: countries (governments), non-state entities and individuals. The following types of sanctions are applied by the EU: arms embargoes (comprising a ban on financing and providing financial support), economic and financial sanctions (also a ban on provision of specific services, such as financial services) and a ban on financial transfers. Economic and financial sanctions have to be complied with by all individuals and legal persons operating within the territory of the EU as well as EU entities operating abroad; restrictions on admission; anti-terrorist sanctions (the EU applies sanctions against entities suspected of terrorist activity executing of Resolution No. 1267 and 1373 of the United Nations Security Council).
2. UN sanctions imposed by the UN, also through resolutions of the United Nations Security Council, which, pursuant to Article 25 of the United Nations Charter (ratified by Poland) have to be enforced by member states and are subject to transposition to the legal framework of the EU by the competent authorities of the European Community through amendments to regulations. A link to the list of effective Council Regulations can be found below.
3. Sanctions of the United States of America (the "USA") are, as a rule, imposed by the Department of the Treasury (e.g. OFAC) and the Department of State. A link to the list of sanctions and sanction programs introduced by OFAC can be found below. The USA sanctions are applied in whole whenever a US Person is a party to the transaction. U.S person is defined as:
 - a USA citizen;
 - a USA resident;
 - a legal person established under the laws of the USA, along with its foreign branches;
 - a USA visitor

In certain situations, the USA sanctions are applied in a limited scope, when:

- 1) the transaction is processed and settled through the USA or the correspondent bank has the status of a US Person;
- 2) a Citigroup entity with the status of a US Person participates in the transaction or activity covered by the sanction program;

- 3) the Bank's employee with the status of a US Person participates in the transaction or activity subject to sanctions;
- 4) the transaction will violate sanctions program imposed on Cuba and Iran, regardless of the amount and currency of the transaction.

Referring item 4) above, if it follows from the transaction data and its nature that the transaction is linked to a Cuban or Iranian person or entity, whether directly or indirectly, it will be examined in terms of its compliance with OFAC regulations.

Examples:

Cuba

- If it follows from the transfer data that a corporate customer is a payer or beneficiary of a payment for a tourist trip to Cuba, the transaction will not be processed and the funds will be transferred back to the payer. Such payment is indirectly related to an entity located in Cuba (hotel, cruise ship or another Cuban entity providing services related to a specific trip).
- If the transfer concerns payment for a ticket to Cuba, sales of goods originating from Cuba (such as Cuban cigars or sugar) and is made to a Cuban national residing in Cuba, the transaction will not be processed and the funds will be transferred back to the payer.

Iran

When a government institution, an entity controlled by the Iranian government or another Iranian entity or person is a party to the transaction, the transaction will be analyzed whether it is placed within the acceptable turnover, comprising:

- expenses related to the payment for travel to Iran (tickets, visa, accommodation, meals);
- export/import of information materials;
- low-value items purchased in Iran;
- non-commercial settlements between family members;
- fees for delivery of humanitarian aid.

Other transactions linked to Iran, whether directly or indirectly, may be subject to limitations.

Use of cards

It is not permissible to make payments with Martercard or Visa cards issued by Bank Handlowy w Warszawie S.A. including the use ATMs located within the territory of Cuba and Iran.

Regulations adopted by the European Union, the United Nations and the United States of America may impose the obligation to freeze funds if an entity included in a sanction list is a party to the transaction.

The aforementioned lists are available publicly on the following websites:

1. European Union sanction lists and programs are available at:
http://ec.europa.eu/external_relations/cfsp/sanctions/consol-list_en.htm
<http://eur-lex.europa.eu/pl/index.htm>
2. Sanction lists and programs introduced by OFAC – Office of Foreign Assets Control:
<http://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>
3. UN sanction lists are available at:
<http://www.un.org/sc/committees/1267/consolist.shtml>

Below are detailed regulations adopted by the European Council in relation to particular countries:

Iran

COUNCIL REGULATION (EU) No 359/2011 of 12 April 2011 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Iran

COUNCIL REGULATION (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran and repealing Regulation (EU) No 961/2010

COUNCIL REGULATION (EU) No 708/2012 of 2 August 2012 amending Regulation (EU) No 267/2012 concerning restrictive measures against Iran

COUNCIL REGULATION (EU) No 1263/2012 of 21 December 2012 amending Regulation (EU) No 267/2012 concerning restrictive measures against Iran

Sudan

COUNCIL REGULATION (EC) No 131/2004 of 26 January 2004 concerning certain restrictive measures in respect of Sudan

COUNCIL REGULATION (EC) No 838/2005 of 30 May 2005 amending Regulation (EC) No 131/2004 concerning certain restrictive measures in respect of Sudan

COUNCIL REGULATION (EC) No 1184/2005 of 18 July 2005 imposing certain specific restrictive measures directed against certain persons impeding the peace process and breaking international law in the conflict in the Darfur region in Sudan

COUNCIL REGULATION (EU) No 1215/2011 of 24 November 2011 amending Regulation (EC) No 131/2004 concerning certain restrictive measures in respect of Sudan

Burma

COUNCIL REGULATION (EC) No 194/2008 of 25 February 2008 renewing and strengthening the restrictive measures in respect of Burma/Myanmar and repealing Regulation (EC) No 817/2006

COUNCIL REGULATION (EU) No 409/2012 of 14 May 2012 suspending certain restrictive measures laid down in Regulation (EC) No 194/2008 renewing and strengthening the restrictive measures in respect of Burma/Myanmar

COUNCIL REGULATION (EU) No 401/2013 of 2 May 2013 concerning restrictive measures in respect of Myanmar/Burma and repealing Regulation (EC) No 194/2008

Syria

COUNCIL REGULATION (EU) No 36/2012 of 18 January 2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) No 442/2011

COUNCIL REGULATION (EU) No 168/2012 of 27 February 2012 amending Regulation (EU) No 36/2012 concerning restrictive measures in view of the situation in Syria

COUNCIL REGULATION (EU) No 867/2012 of 24 September 2012 amending Regulation (EU) No 36/2012 concerning restrictive measures in view of the situation in Syria

North Korea

COUNCIL REGULATION (EC) No 329/2007 of 27 March 2007 concerning restrictive measures against the Democratic People's Republic of Korea

COMMISSION REGULATION (EC) No 117/2008 of 28 January 2008 amending Council Regulation (EC) No 329/2007 concerning restrictive measures against the Democratic People's Republic of Korea

COUNCIL REGULATION (EU) No 1283/2009 of 22 December 2009 amending Council Regulation (EC) No 329/2007 concerning restrictive measures against the Democratic People's Republic of Korea

Iraq

COUNCIL REGULATION (EC) No 1210/2003 of 7 July 2003 concerning certain specific restrictions on economic and financial relations with Iraq and repealing Regulation (EC) No 2465/96

COUNCIL REGULATION (EU) No 131/2011 of 14 February 2011 amending Regulation (EC) No 1210/2003 concerning certain specific restrictions on economic and financial relations with Iraq

Libya

COUNCIL REGULATION (EU) No 204/2011 of 2 March 2011 concerning restrictive measures in view of the situation in Libya

COUNCIL REGULATION (EU) No 296/2011 of 25 March 2011 amending Regulation (EU) No 204/2011 concerning restrictive measures in view of the situation in Libya

COUNCIL REGULATION (EU) No 572/2011 of 16 June 2011 amending Regulation (EU) No 204/2011 concerning restrictive measures in view of the situation in Libya

COUNCIL REGULATION (EU) No 965/2011 of 28 September 2011 amending Regulation (EU) No 204/2011 concerning restrictive measures in view of the situation in Libya

COUNCIL REGULATION (EU) No 1360/2011 of 20 December 2011 amending Regulation (EU) No 204/2011 concerning restrictive measures in view of the situation in Libya

Belarus

COUNCIL REGULATION (EC) No 765/2006 of 18 May 2006 concerning restrictive measures against President Lukashenko and certain officials of Belarus

COUNCIL REGULATION (EC) No 646/2008 of 8 July 2008 amending Regulation (EC) No 765/2006 concerning restrictive measures against President Lukashenko and certain officials of Belarus

COUNCIL REGULATION (EU) No 84/2011 of 31 January 2011 amending Regulation (EC) No 765/2006 concerning restrictive measures against President Lukashenko and certain officials of Belarus

COUNCIL REGULATION (EU) No 999/2011 of 10 October 2011 amending Regulation (EC) No 765/2006 concerning restrictive measures in respect of Belarus

COUNCIL REGULATION (EU) No 114/2012 of 10 February 2012 amending Regulation (EC) No 765/2006 concerning restrictive measures in respect of Belarus

COUNCIL REGULATION (EU) No 354/2012 of 23 April 2012 amending Regulation (EC) No 765/2006 concerning restrictive measures in respect of Belarus

Democratic Republic of Congo and Ruanda

COUNCIL REGULATION (EC) No 1183/2005 of 18 July 2005 imposing certain specific restrictive measures directed against persons acting in violation of the arms embargo with regard to the Democratic Republic of the Congo

Lebanon

COUNCIL REGULATION (EC) No 305/2006 of 21 February 2006 imposing specific restrictive measures against certain persons suspected of involvement in the assassination of former Lebanese Prime Minister Rafiq Hariri

Liberia

COUNCIL REGULATION (EC) No 234/2004 of 10 February 2004 concerning certain restrictive measures in respect of Liberia and repealing Regulation (EC) No 1030/2003

COUNCIL REGULATION (EC) No 872/2004 of 29 April 2004 concerning further restrictive measures in relation to Liberia

Sierra Leone

COUNCIL REGULATION (EC) No 303/2002 of 18 February 2002 concerning the importation into the Community of rough diamonds from Sierra Leone

Somalia

COUNCIL REGULATION (EU) No 356/2010 of 26 April 2010 imposing certain specific restrictive measures directed against certain natural or legal persons, entities or bodies, in view of the situation in Somalia

Ivory Coast (Côte d'Ivoire)

COUNCIL REGULATION (EC) No 174/2005 of 31 January 2005 imposing restrictions on the supply of assistance related to military activities to Côte d'Ivoire

COUNCIL REGULATION (EC) No 560/2005 of 12 April 2005 imposing certain specific restrictive measures directed against certain persons and entities in view of the situation in Côte d'Ivoire

COUNCIL REGULATION (EU) No 25/2011 of 14 January 2011 amending Regulation (EC) No 560/2005 imposing certain specific restrictive measures directed against certain persons and entities in view of the situation in Côte d'Ivoire

COUNCIL REGULATION (EU) No 330/2011 of 6 April 2011 amending Regulation (EC) No 560/2005 imposing certain specific restrictive measures directed against certain persons and entities in view of the situation in Côte d'Ivoire

COUNCIL REGULATION (EU) No 668/2011 of 12 July 2011 amending Regulation (EC) No 174/2005 imposing restrictions on the supply of assistance related to military activities to Côte d'Ivoire

Afghanistan and Al-Qaida

COUNCIL REGULATION (EC) No 881/2002 of 27 May 2002 imposing certain specific restrictive measures directed against certain persons and entities associated with Usama bin Laden, the Al-Qaida network and the Taliban, and repealing Council Regulation (EC) No 467/2001 prohibiting the export of certain goods and services to Afghanistan, strengthening the flight ban and extending the freeze of funds and other financial resources in respect of the Taliban of Afghanistan

COUNCIL REGULATION (EC) No 561/2003 of 27 March 2003 amending, as regards exceptions to the freezing of funds and economic resources, Regulation (EC) No 881/2002 imposing certain specific restrictive measures directed against certain persons and entities associated with Usama bin Laden, the Al-Qaida network and the Taliban

COUNCIL REGULATION (EU) No 753/2011 of 1 August 2011 concerning restrictive measures directed against certain individuals, groups, undertakings and entities in view of the situation in Afghanistan

COUNCIL REGULATION (EU) No 754/2011 of 1 August 2011 amending Regulation (EC) No 881/2002 imposing certain specific restrictive measures directed against certain persons and entities associated with Usama bin Laden, the Al-Qaida network and the Taliban

Zimbabwe

COUNCIL REGULATION (EC) No 314/2004 of 19 February 2004 concerning certain restrictive measures in respect of Zimbabwe

Detailed information concerning sanction programs adopted in the United States of America by OFAC (Office of Foreign Assets Control) is available at <http://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>, and applies mainly to:

- Balkans-Related Sanctions
- Belarus Sanctions
- Burma Sanctions
- Cote d'Ivoire (Ivory Coast)-Related Sanctions
- Counter Narcotics Trafficking Sanctions
- Counter Terrorism Sanctions

Cuba Sanctions
Democratic Republic of the Congo-Related Sanctions
Iran Sanctions
Iraq-Related Sanctions
Lebanon-Related Sanctions
Former Liberian Regime of Charles Taylor Sanctions
Libya Sanctions
Magnitsky Sanctions
Non-Proliferation Sanctions
North Korea Sanctions
Rough Diamond Trade Controls
Somalia Sanctions
Sudan Sanctions
Syria Sanctions
Transnational Criminal Organizations
Yemen-Related Sanctions
Zimbabwe Sanctions