



## НАЦІОНАЛЬНИЙ БАНК УКРАЇНИ

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## NATIONAL BANK OF UKRAINE

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**To banking institutions**  
*(according to the mailing list)*

**JSC “ALFA-BANK”**

*Regarding the provision of information  
on the activities and owners of significant  
shareholding of JSC “ALFA-BANK”*

The National Bank of Ukraine (the “National Bank”) hereby informs as follows.

According to the decision of the Council of the EU dated 28 February 2022 No. 2022/336, which amends the decision of the Council of the EU dated 17 March 2014 No. 269/2014, Mr. Petr Aven and Mr. Mikhail Fridman were included in the list of individually sanctioned persons.

Additionally, according to the decision of the Council of the EU dated 15 March 2022 No. 2022/427, which amends the decision of the Council of the EU dated 17 March 2014 No. 269/2014, Mr. German Khan and Mr. Alexey Kuzmichev were included in the list of individually sanctioned persons.

On 15 March 2022 UK government posted<sup>1</sup> information that sanctions have been applied to Mr. Petr Aven, Mr. Mikhail Fridman, Mr. German Khan and Mr. Alexey Kuzmichev.

Pursuant to the information of the National Bank as of the date of this letter:

Mr. Mikhail Fridman indirectly owns a share of 32.8632% in the authorised capital of JOINT STOCK COMPANY “ALFA-BANK” (JSC “ALFA-BANK” or the “Bank”) through ABH Holdings SA, which owns 57.6006% of the Bank’s shares and 100% in ABH Ukraine Limited, which owns 42.3994% of the Bank’s shares and, accordingly, owns a significant shareholding in JSC “ALPHA-BANK”;

Mr. Petr Aven indirectly owns a share of 12.4018% in the authorised capital of JSC “ALPHA-BANK” through ABH Holdings SA, which owns 57.6006% of the Bank’s shares and 100% in ABH Ukraine Limited, which owns 42.3994% of the Bank’s shares and, accordingly, owns a significant shareholding in JSC “ALPHA-BANK”.

Mr. German Khan indirectly owns a share of 20.9659% in the authorised capital of JSC “ALPHA-BANK” through ABH Holdings SA, which owns 57.6006% of the Bank’s shares and 100% in ABH Ukraine Limited, which owns 42.3994% of the Bank’s shares and, accordingly, owns a significant shareholding in JSC “ALPHA-BANK”.

<sup>1</sup> <https://www.gov.uk/government/news/foreign-secretary-announces-historic-round-ofsanctions-15-march-2022>



ДОКУМЕНТ СЕД НБУ АСКОД

Підписувач Матузка Ярослав Васильович

Сертифікат 36186A0FEAAD76B20400000BD11000082490000

Дійсний до: 15.09.2023 14:27:52

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Mr. Alexey Kuzmichev indirectly owns a share of 16.3239% in the authorised capital of JSC “ALPHA-BANK” through ABH Holdings SA, which owns 57.6006% of the Bank’s shares and 100% in ABH Ukraine Limited, which owns 42.3994% of the Bank’s shares and, accordingly, owns a significant shareholding in JSC “ALPHA-BANK”.

On 2 March 2022, the National Bank, guided by the legislation of Ukraine, decided to recognize the business reputation of Mr. Petr Aven and Mr. Mikhail Fridman as non-impeccable and to apply a regulatory restrictive measure in the form of a temporary (until the violation is remedied) prohibition to the owners of the significant shareholding in JSC “ALPHA-BANK” to use their voting rights, namely:

to Mr. Petr Aven – the voting rights for 35,625,717,685 ordinary registered shares in JSC “ALPHA-BANK”, representing 12.4018% of the authorized capital of JSC “ALPHA-BANK” due to his holding of 12.4018% of the authorized capital of ABH Holdings SA (Luxembourg) – the controller of JSC “ALFA-BANK” holding 100% of the shares of ABH Ukraine Limited (Cyprus), which holds 42.3994% of the shares of JSC “ALPHA-BANK” and directly holding 57.6006% of the shares of JSC “ALPHA-BANK”;

to Mr. Mikhail Fridman – the voting rights for 94,403,641,843 ordinary registered shares in JSC “ALFA-BANK”, representing 32.8632% of the authorized capital of JSC “ALFA-BANK” due to his holding of 32.8632% of the authorized capital of ABH Holdings SA (Luxembourg) – the controller of JSC “ALPHA-BANK” holding 100% of the shares of ABH Ukraine Limited (Cyprus), which holds 42.3994% of the shares of JSC “ALPHA-BANK” and directly holding 57.6006% of the shares of JSC “ALPHA-BANK”;

to ABH Holdings SA – the voting rights for 74,897,945,233 ordinary registered shares in JSC “ALFA-BANK”, representing 26.073% of the authorized capital of JSC “ALPHA BANK”;

to ABH Ukraine Limited – the voting rights for 55,131,672,831 ordinary registered shares in JSC “ALFA-BANK”, representing 19.19209% of the authorized capital of JSC “ALPHA-BANK”.

On 21 March 2022, the National Bank, guided by the legislation of Ukraine, decided to recognize the business reputation of Mr. German Khan and Mr. Alexey Kuzmichev as non-impeccable and to apply a regulatory restrictive measure in the form of a temporary (until the violation is remedied) prohibition to the owners of the significant shareholding in JSC “ALPHA-BANK” to use their voting rights, namely:

to Mr. German Khan – the voting rights for 60,227,163,348 ordinary registered shares in JSC “ALPHA-BANK”, representing 20.9659% of the authorized capital of JSC “ALPHA-BANK” due to his holding of 20.9659% of the authorized capital of ABH Holdings SA (Luxembourg) – the controller of JSC “ALFA-BANK” holding 100% of the shares of ABH Ukraine Limited (Cyprus), which holds 42.3994% of the shares of JSC “ALPHA-BANK” and directly holding 57.6006% of the shares of JSC “ALPHA-BANK”;

to Mr. Alexey Kuzmichev – the voting rights for 46,892,439,236 ordinary registered shares in JSC “ALFA-BANK”, representing 16.3239% of the authorized capital of JSC “ALFA-BANK” due to his holding of 16.3239% of the authorized capital of ABH Holdings SA (Luxembourg) – the controller of JSC “ALPHA-BANK” holding 100% of the shares of ABH Ukraine Limited (Cyprus), which holds 42.3994% of the shares of JSC “ALPHA-BANK” and directly holding 57.6006% of the shares of JSC “ALPHA-BANK”;

to ABH Holdings SA – the voting rights for 61,701,533,805 ordinary registered shares in JSC “ALFA-BANK”, representing 21.4791% of the authorized capital of JSC “ALPHA BANK”;

to ABH Ukraine Limited – the voting rights for 45,418,068 778 ordinary registered shares in JSC “ALFA-BANK”, representing 15.8107% of the authorized capital of JSC “ALPHA-BANK”.

The deadline for fixing the violations of banking legislation by Mr. Petr Aven, Mr. Mikhail Fridman, Mr. German Khan and Mr. Alexey Viktorovich Kuzmichev is 1 (one) year from the date of the decision of the National Bank.



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Сертифікат 36186A0FEAAD76B204000000BD11000082490000

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The temporary prohibition of the voting rights means prohibiting a shareholder (participant) of the bank to vote at the general participants meeting of the bank and in any way to participate in the bank's management.

Mr. Petr Aven, Mr. Mikhail Fridman, Mr. German Khan and Mr. Alexey Kuzmichev, who are subject to the EU and the UK sanctions, are not controllers of the Bank within the meaning of the Ukrainian law.

We also note that no Ukrainian or international sanctions have been applied to the Bank as of now.

The Bank is a systemically important bank in Ukraine, whose activities affect the stability of the financial system as a whole, and is the object of critical infrastructure in accordance with the National Bank's Resolution No. 151 "On Approval of the Regulation on Critical Infrastructure in the Banking Sector of Ukraine" dated 30 November 2020<sup>2</sup>.

The Bank continues to properly fulfill its obligations, including settlement and cash transactions for the transfer of funds, cash withdrawals. The Bank has taken measures to ensure the operation of branches, uninterrupted operation of online digital banking services, and cash ATMs. The Bank continues to operate and function in accordance with the established requirements of the National Bank.

Please take note of this information and use it during cooperation with JSC "ALPHA-BANK" (Ukraine).

Deputy Governor  
National Bank of Ukraine

Yaroslav MATUZKA

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<sup>2</sup> <https://bank.gov.ua/ua/news/all/natsionalniy-bank-onoviv-perelik-sistemno-vajlivih-bankiv-10928>



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