

ATTACHMENT FOR ARMENIA

May 2026

1. QI is subject to the following laws and regulations of Armenia, governing the requirements of QI to obtain documentation confirming the identity of QI's account holders.
 - Law of the Republic of Armenia "On Combating Money Laundering and Terrorism Financing" (HO-80-N, adopted May 26, 2008, revised by HO-113-N, June 14, 2021) (the "Law"): Article 3-8; Article 10; Article 16-18; Article 20; Article 22-23; Article 25; Article 30.
 - Decision No. 279-N, dated October 7, 2014, of the Board of the Central Bank "On Invalidating Decision No. 269-N of the Board of the Central Bank of the Republic of Armenia, dated September 9, 2008, and On Approving the Regulation on Minimum Requirements For Persons Reporting in the Field of Prevention of Money Laundering and Terrorism Financing" (the "Regulation"): Chapters 5-9; Annex 2.
2. QI represents that the laws identified above are enforced by the following enforcement bodies and QI shall provide the IRS with an English translation of any reports or other documentation issued by these enforcement bodies that are relevant to QI's functions as a qualified intermediary.
 - The Central Bank of Armenia ("CBA"), acting as the Supervisory and Authorized Body in accordance with the Law.
3. QI represents that the following penalties apply to failure to obtain, maintain, and evaluate documentation obtained under the laws and regulations identified in item 1 above.

Under Article 30 of the Law:

Financial Institutions:

- Failure to comply with AML/CFT requirements, or improper compliance, entails measures of liability established by the legislation governing their activities, in accordance with the procedure established by that legislation. Where such legislation does not provide for liability measures, sanctions equivalent to those applicable to non-financial legal entities apply.

Non-Financial Legal Entities (including Credit Bureaus):

- Failure to perform or improper performance of AML/CFT obligations may result in:
 - Warning; or
 - Imposition of fine ranging from five hundred to five thousand times the established minimum salary established by law per violation.

For violations related to Article 28 (Freezing of assets of persons associated with terrorism or the proliferation of weapons of mass destruction) obligations, impose a fine ranging from one thousand to ten thousand times the established minimum salary established by law per violation.

For non-commercial organizations and trustees (or similar managing legal persons), sanctions include a warning or imposition of a fine of five hundred times the minimum

salary established by law.

Supervisory authorities may also issue instructions to eliminate, rectify, or prevent violations in the future, with specified deadlines and measures for implementing such instructions.

Under the law “On Banks and Banking” (HO-68-N, adopted June 30, 1996) (the “Banking Law”):

Article 61(1): CBA, as the competent supervisory authority, may impose the following sanctions on banks:

- Warning and assignment to eliminate the violations;
- Fine;
- Revocation of qualification certificates of senior bank officials;
- Revocation of the license.

Article 63(3): The monetary fine for violations of banking legislation may not exceed 1% of the minimum authorized capital stock defined by the CBA.

Under Central Bank Council Resolution No. 39-N (2007), Article 15, the minimum amount of a bank’s charter capital is set at one billion Armenian drams. Therefore, the maximum administrative fine for regulatory breaches is currently capped at 10,000,000 Armenian drams. See HO-68-N, Article 63(3).

Article 61(2): The imposition of administrative sanctions does not exempt a bank or its executive officers from other forms of liability under applicable laws or other legal acts and agreements, including civil, criminal, or contractual obligations.

4. QI shall use the following specific documentary evidence (and any specific documentation added by an amendment to this item 4 as agreed to by the IRS) to comply with section 5 of this Agreement, provided that the following specific documentary evidence satisfies the requirements of the laws and regulations identified in item 1 above. In the case of a foreign person, QI may, instead, use a Form W-8 in accordance with section 5 of this Agreement. Either QI, or a banking or securities association in Armenia, may request an amendment of this item 4.

(i) For a natural person or sole practitioner:

(a) Identification document or other official documents containing a photograph;

(b) Minimum information required:

- First and last name,
- Citizenship,
- Registration address (if available),
- Date (year, month, day) and place of birth,
- Series and number of the identification document,
- Date of issuance,
- For sole practitioners: registration number and taxpayer identification number, and
- Other information as may be prescribed by law;

(c) The reporting entity must also determine the customer’s place of residence.

(ii) For a legal entity:

(a) State registration certificate or other official documents;

(b) Minimum information required:

- Name of the legal entity,
- Registered address,
- Actual business address (if different from registered address),
- Charter or similar governing document,
- Identification number (e.g., state registration number),
- Full name of the person or body responsible for management, as well as the latter's taxpayer identification number (if available), and
- Other information as may be prescribed by law.

(iii) For a state or local self-government body:

(a) Minimum information required:

- Full official name of the state or local body, and
- Country.

5. QI shall follow the procedures set forth below (and any procedures added by an amendment to this item 5 as agreed to by the IRS) to confirm the identity of account holders that do not open accounts in person or who provide new documentation for existing accounts other than in person. In the case of a foreign person, QI may, instead, use a Form W-8 in accordance with section 5 of this Agreement. Either QI, or a banking or securities association in Armenia, may request an amendment to this item 5.

- (i) QI shall not open an account by any means other than by establishing in person the identity of a customer through the account holder's own identity documents, except as permitted in (ii) and (iii) below, and provided that such procedures comply with the high-risk requirements for non-face-to-face relationships set forth in Clause 27(6) and Clause 34 of the Regulation.
- (ii) QI may obtain by mail or otherwise a copy that is an exact reproduction of the specific documentary evidence listed in item 4 above from another person that is subject to know-your-customer rules that have been approved by the IRS for purposes of qualified intermediary agreements, provided that the laws and regulations listed in item 1 permit QI to rely on the other person to identify the account holder.
- (iii) QI may obtain a photocopy of the specific documentary evidence listed in item 4 by mail or otherwise remotely from the account holder or a person acting on behalf of the account holder, provided that the photocopy has been certified as a true and correct copy by a person whose authority to make such certification appears on the photocopy, and provided that the laws and regulations listed in item 1 permit QI to rely on the certified photocopy to identify the account holder, provided that:
 - (a) The photocopy has been certified as a true and correct copy by a person whose authority to make such certification appears on the photocopy;
 - (b) Article 16(4) and Articles 17-18 of the Law, along with Chapter 6 of the Regulation permits QI to rely on such a certified copy;
 - (c) The certification and verification procedures meet the high-risk criteria set for non-face-to-face relationships, including ensuring document authenticity and matching the information with reliable source.