

Important Information!

**To all
XONTRO-Members
and Vendors**

29. August 2014

US/EU Sanctions regarding Russia

Dear Sir or Madam,

As you are aware, the United States of Amerika and European Union have imposed sanctions against a number of Russian financial and energy institutions. This circular reminds all customers of XONTRO on their obligations resulting from these sanctions in context with the services provided by Brain-Trade gmbH.

Please read this circular carefully and inform immediately all relevant contacts within your organisation.

The European Union has issued Council Decision 2014/512/CFSP, which prohibits the direct or indirect purchase or sales of, the brokering or assistance in the issuance of, or any other dealing with bonds, equity, or similar financial instruments with a maturity exceeding 90 days issued after 1 August 2014 for named entities, certain entities owned more than 50 percent by a named entity, or any person acting on behalf of or at the direction of the foregoing (collectively, "EU-Prohibited New Financing").

The United States has issued Executive Order 13662, and Directives 1 and 2 implementing the Executive Order, creating the Sectoral Sanctions Identification List. These actions prohibit transacting in, providing financing for, or otherwise dealing in debt with a maturity of longer than 90 days or, in the case of financial institutions named under Directive 1, equity, if that debt or equity is extended or issued on or after the date on which the Directives became effective by or on behalf of the persons named in the Sectoral Sanctions Identifications List (including any entity that is, directly or indirectly, 50 percent or more owned by a listed person) (collectively, "US-Prohibited New Financing").

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All customers (including any of the counterparties, beneficiaries, intermediaries and/or service providers) (collectively "Customers") are hereby notified that, until further notice, any transaction or other business activity now or in the future with or through BrainTrade GmbH that has the direct or the indirect objective or effect of issuing of, creating of, dealing in or facilitating EU-Prohibited New Financing or US-Prohibited New Financing is strictly prohibited, regardless of the nature of the financial instruments or services, the nationality or place of incorporation or business of the parties involved or the applicable currency of a transaction or business activity. By continuing to engage in transactions or other business activities with BrainTrade GmbH, all Customers are deemed to represent and warrant their compliance with the foregoing prohibition.

Yours faithfully,



Jörg Schöneberg