La Hulpe, 3 January 2020

To the Russian SWIFT Association (Rosswift)

Dear Sir,
Dear Madam,

We hereby confirm that the Company S.W.I.F.T. scrl, with residency in Belgium (Avenue Adèle 1, B-1310 La Hulpe), for the purpose of the Convention between the Government of the Russian Federation and the Government of the Kingdom of Belgium for the avoidance of double taxation with respect to taxes on income and on capital (16 June 1995), is the beneficial owner of the income in the form of royalty for authorizing SWIFT users to use SWIFT licensed software products (Alliance Interfaces Fees: Alliance Access, Alliance Entry, Alliance Gateway, Alliance Webstation; SWIFTNet Link (SNL Licences fees, Operating System, Develop Toolkit) and RMA Services. S.W.I.F.T. scrl is the beneficial owner of the mentioned above income, i.e. it

1. has an absolute right to use and/or dispose of this income;
2. has no mediation functions in relation to the income earned;
3. is not obliged to transfer, either directly or indirectly, the received income (in full or in part) to another person.
4. has no permanent establishment in the Russian Federation

Frédéric Herman
Head of Tax

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