SAY. RI REPORT

Sayari Master Class - Russian Transparency - FAQ

Russia Analyst Questions

Do Russian affiliates lists only include Russian entities or are international entities included as well?

Russian affiliates lists can include foreign companies as well as Russian companies. Whether or not a foreign entity is included on an affiliates list is up to the joint-stock company that the list belongs to. When foreign entities do appear on an affiliates list, they can be listed in a variety of formats. The most common format is for the name and address of the foreign entity to be transliterated into cyrillic. Occasionally, some affiliates lists will list entities by their native, non-cyrillic name — however, this entirely depends on who is compiling the list.

Will inurl searches work on other Russian sites as well, such as the Russian court records site sudact.ru?

Yes. Inurl queries are a great way to quickly filter out noise from search results and save time when combing websites for information. We have found that, more often than not, the inurl search operator works with a wide variety of Russian websites. These include: sudact.ru, cbr. ru and e-disclosure.ru. Common barriers to using this operator typically include paywalls, complicated CAPTCHAs, as well as files that are not text searchable.

Have the <u>2019 changes</u> to Russia's disclosure laws relating to JSCs had any impact on the ability to access Russian disclosures?

In April 2019, the Russian government signed Executive Decree 400, which established a set of conditions under which a Russian JSC can opt out of disclosing its owners, directors, financial information, trade deals, affiliates and shareholders. Per the decree, a JSC may opt of disclosing this information if it is exposed to sanctions risk or if the activity in question involves Russia's defense industry.

We have determined that the bulk of disclosures affected by this measure belong to Russian defense companies, with non-defense, sanctioned entities being largely unaffected (meaning their disclosures are still available). The affected disclosures of the sanctioned defense companies typically appear as the complete documents with only the relevant information visibly omitted citing Executive Decree 400.

Similarly, in June 2019, the government signed Executive Decree 729 — this time focused on the Federal Tax Registry. Under this decree, authorities are no longer required to disclose detailed company information if the company is exposed to sanctions risk, registered in Crimea, or a financial institution that underwrites defense projects. We have yet to see a serious implementation of this decree and have found it to have minimal effect on our investigations.

How can I learn more about Russia public records investigations?

For more examples of how we use public records in Russia and elsewhere to conduct investigations into financial crime, visit the <u>Sayari Blog</u> or sign up for our newsletter.

Sayari Graph Platform Questions

What data does Sayari Graph include?

Sayari Graph currently holds over 626 million records from 188 different sources across the globe, including from traditionally hard-target jurisdictions such as China, Russia, and Iran.

What language support does Sayari Graph offer?

Sayari Graph offers multiple translation and transliteration functions to help you explore records in foreign languages. This is everything from on-demand translation of record text to translating your search terms and results. We use a combination of Google Translate, translations and transliterations we generated ourselves based on internal deep learning models, and translations native to the original documents (for example, when Chinese companies disclose their names in English).

Does Graph have any Russian maritime data?

Yes. Graph includes the Russian Maritime Register of Shipping, an online database containing the details of commercial vessels sailing under the Russian flag. The database includes a vessel's ownership. Since it includes an entity's Russian tax identification number, Graph is able to show links between a vessel and a corresponding Russian entity via that entity's excerpt from the Federal Tax Registry — also included in the platform. This makes identifying vessels owned by Russian entities quick and easy.

How often do you update the data in Sayari Graph?

Constantly. Each source runs on its own schedule to account for client usage, size, and complexity. All updates take place at least once per year, and typically more frequently than that for the average source (e.g. quarterly).

Can I export this data?

Yes, we make all original source documents available for download in the platform or via API. You can also export data as a CSV to integrate with other systems.