



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

## **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked “N/A”.

The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)





(5) [REDACTED]

(6) Portfolio sales – [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

“10. By way of derogation from paragraphs 1 and 2, the competent authorities of a Member State may, under such conditions as they deem appropriate, authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, to a natural or legal person, entity or body listed in the Annex, after having determined that: (a) the funds or economic resources are necessary for the sale and transfer by 9 October 2022 of proprietary rights in a legal person, entity or body established in the Union where those proprietary rights are directly or indirectly owned by a natural or legal person, entity or body listed in the Annex; and

(b) the proceeds of such sale and transfer remain frozen.’;”

“Furthermore in Article 3c, the following paragraphs are added: ‘6. By way of derogation from paragraphs 1 and 4, the national competent authorities may authorise, under such conditions as they deem appropriate, the execution of an aircraft financial lease concluded before 26 February 2022 after having determined that: (a) it is strictly necessary to ensure lease re-payments to a legal person, entity or body incorporated or constituted under the law of a Member State which does not fall under any of the restrictive measures provided for in this Regulation; and (b) no economic resources will be made available to the Russian counterpart, with the exception of the transfer of ownership of the aircraft after full reimbursement of the financial lease. 7. The Member State concerned shall inform the other Member States and the Commission of any authorisations granted under this Article within two weeks of the authorisation. 8. The prohibition in paragraph 1 shall be without prejudice to Articles 2(4)(b) and 2a(4)(b).’;”

**(7) Rental Income**

[REDACTED]

**(8) Directors**

[REDACTED]

- 5m) Article 5m 1. It shall be prohibited to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary: (a) Russian nationals or natural persons residing in Russia; (b) legal persons, entities or bodies established in Russia; (c) legal persons, entities or bodies whose proprietary rights are directly or indirectly owned for more than 50 % by a natural or legal person, entity or body referred to in points (a) or (b); (d) legal persons, entities or bodies controlled by a natural or legal person, entity or body referred to in points (a), (b) or (c); (e) a natural or legal person, entity or body acting on behalf or at the direction of a natural or legal person, entity or body referred to in points (a), (b), (c) or (d). 2. It shall be prohibited as of 10 May 2022 to act as, or arrange for another person to act as, a trustee, nominee shareholder, director, secretary or a similar position, for a trust or similar legal arrangement as referred to in paragraph 1. 3. Paragraphs 1 and 2 shall not apply to the operations that are strictly necessary for the termination by 10 May 2022 of contracts which are not compliant with this Article concluded before 9 April 2022 or ancillary contracts necessary for the execution of such contracts. 4. Paragraphs 1 and 2 shall not apply when the trustor or beneficiary is a national of a Member State or a natural person having a temporary or permanent residence permit in a Member State. 5. By way of derogation from paragraphs 1 and 2, the competent authorities may authorise the services referred to therein, under such conditions as they deem appropriate, after having determined that this is necessary for:

**(9) Council regulation 2022/328 amending 833/2014 – Employment contract query.**

Article 3c Paragraph 4 states:

It shall be prohibited to:

- (a) Provide technical assistance, brokering services or other services related to the goods and technology referred to in paragraph (Aircraft) for any sale,

	<p>(b) supply, transfer of export of those goods and technology, <u>or for the provision of related technical assistance, brokering services or other services, directly or indirectly to any natural or legal person, entity or body in Russia of for the use in Russia.</u></p> <p>[REDACTED]</p>
Date of application	11/04/2022

**SECTION 2 – DETAILS OF THE APPLICANT(S)**

<p><b>Name of applicant(s)</b> (include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe DAC, No 2, Hume street, Dublin 2, Ireland – company number 512927</p>
<p><b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b></p>	<p>GTLK Europe DAC is 100% owned by JSC GTLK</p>
<p><b>Describe the nature of the business performed by the applicant</b></p>	<p>Fully service international leasing platform for both Aircraft and Vessels.</p>
<p><b>Contact Name</b></p>	<p>[REDACTED]</p>
<p><b>Address</b></p>	<p>Hume street, Dublin 2, Ireland</p>

<sup>1</sup> “Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

Telephone number	[REDACTED]
Email address	[REDACTED]

**SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT**

<p><b>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</b></p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</li> <li>e) other</li> </ul> <p><b>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</b></p> <ul style="list-style-type: none"> <li>f) Basic needs of the designated person,</li> <li>g) Reasonable professional fees for the provision of financial services,</li> <li>h) other</li> </ul>	<p><b><u>Salary payments</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Eurobond payments</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Professional service firms</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Other sundry expenses</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Portfolio sales</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources</li> </ul>
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	<ul style="list-style-type: none"> <li>• of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p style="text-align: center;"><b><u>Rental Income</u></b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b>(10) <u>Directors</u></b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b>(11) <u>Council regulation 2022/328 amending 833/2014 – Employment contract query.</u></b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul>
<p><b>Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply ( “designated person”) and to whom the applicant has/had a relationship with</b></p>	<p>JSC GTLK. 100% owns GTLK Europe DAC</p>

Describe the nature of the relationship between the applicant and the designated person(s)	100% owned by the Designated entity.
Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided	Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.

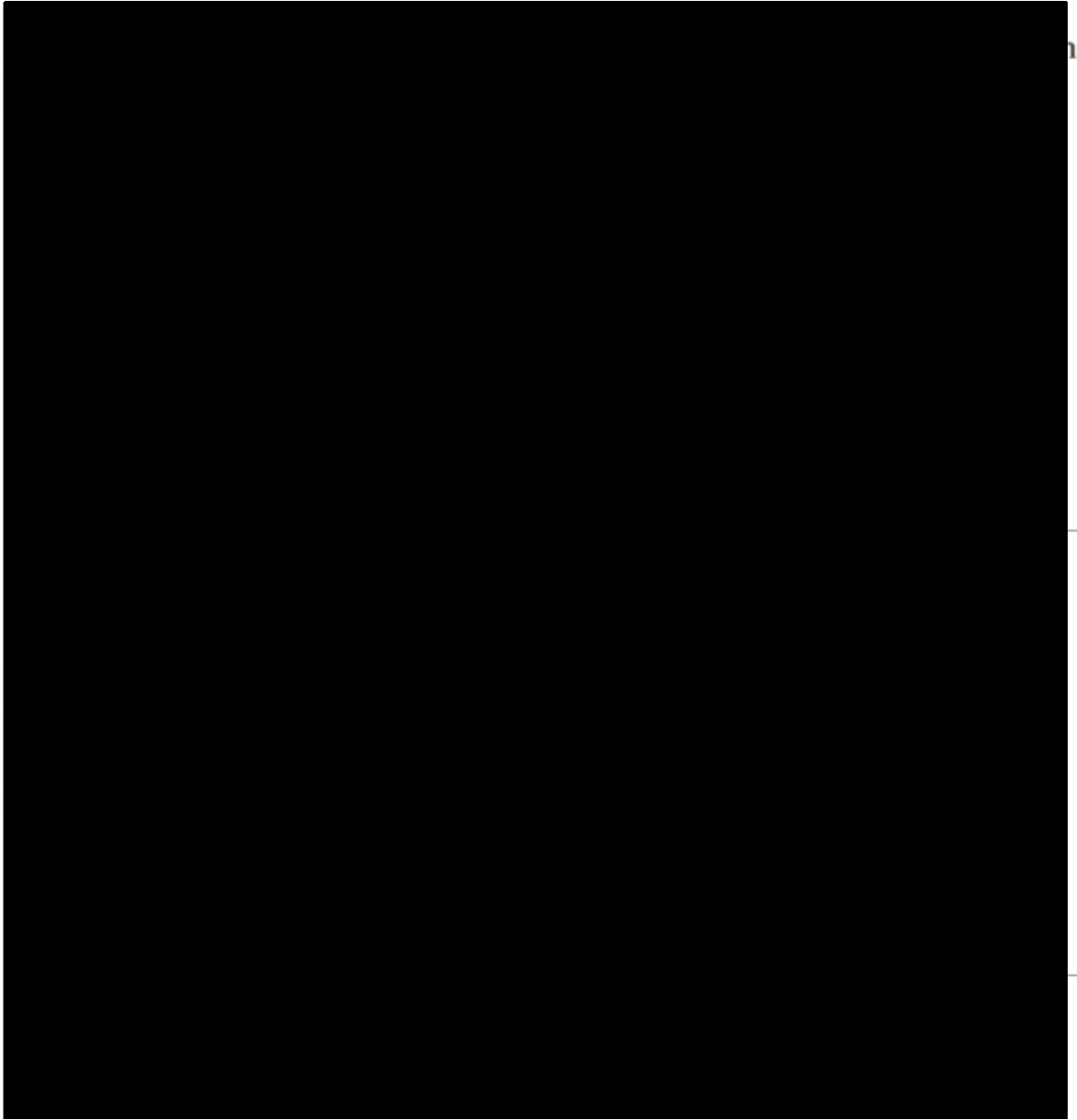
**SECTION 4 – DETAILS OF THE TRANSACTIONS(S) CONCERNED**

Date of contract	Various
Parties to the contract	<ul style="list-style-type: none"> <li>• Gtlk Europe DAC</li> <li>• [REDACTED]</li> <li>■ [REDACTED]</li> <li>• [REDACTED]</li> <li>■ [REDACTED]</li> <li>■ [REDACTED]</li> </ul>
Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.	Yes the company GTLK Europe DAC, which is 100% owned by JSC GTLK.
Date of the intended transaction(s).	■ April and monthly thereafter.
Description of funds, economic resources or financial services to be supplied or obtained.	<p><u>Salary &amp; Sundry payments</u></p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>■ [REDACTED]</li> </ul>

Account Name	Name of Bank	Account Number	IBAN	Swift	Currency
GTLK EUROPE DAC	[REDACTED]	[REDACTED]	[REDACTED]	L	EUR
GTLK EUROPE DAC	[REDACTED]	[REDACTED]	[REDACTED]	D	EUR

(1)

**Eurobond payment**



<p>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</p>	<p>No</p>
<p>Value of the economic resources or financial services to be supplied or obtained (in EUR).</p>	<ul style="list-style-type: none"> <li>• Eurobond - [REDACTED]</li> <li>• Salary - [REDACTED]</li> <li>• Professional service - [REDACTED]</li> <li>• Rental - [REDACTED]</li> </ul>
<p>Is the end user different from the contract customer?</p>	<p>Yes – end users are employees, landlord, service providers and investors.</p>
<p>Is the end user owned or controlled by a designated person?</p>	<p>[REDACTED]</p>

<p><b>Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?</b></p>	<p>“by a person acting on their behalf or at their direction, or by entities owned or controlled by them?”. [REDACTED]</p> <p>[REDACTED]</p>
<p><b>Dates of any transactions or shipments already made.</b></p>	<p>N/A</p>
<p><b>Dates of any future transactions or shipments.</b></p>	<p>N/A</p>

**SECTION 5 – BANKING DETAILS**

<p><b>Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)</b></p>	
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**Salary payments**

[Redacted]

[Redacted]

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

[Redacted]

[Redacted]

[Redacted]

The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

The relevant bank accounts are:

Account Name	Name of Bank	Account Number	IBAN	Swift	Currency
GTLK EUROPE DAC	[Redacted]	[Redacted]	[Redacted]	[Redacted]	EUR
GTLK EUROPE DAC	[Redacted]	[Redacted]	[Redacted]	[Redacted]	EUR

**Eurobond payment**

**SECTION 6 – FURTHER DETAILS**

<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	<p>We are happy to meet in person if this would help your adjudication. [REDACTED]</p>
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**SECTION 7 – DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



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Central Bank of Ireland

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### **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

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Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)







(5) [Redacted]

(6) Portfolio sales – [Redacted]  
[Redacted]

(1) [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

(2) [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

“10. By way of derogation from paragraphs 1 and 2, the competent authorities of a Member State may, under such conditions as they deem appropriate, authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, to a natural or legal person, entity or body listed in the Annex, after having determined that: (a) the funds or economic resources are necessary for the sale and transfer by 9 October 2022 of proprietary rights in a legal person, entity or body established in the Union where those proprietary rights are directly or indirectly owned by a natural or legal person, entity or body listed in the Annex; and

(b) the proceeds of such sale and transfer remain frozen.’;”

“Furthermore in Article 3c, the following paragraphs are added: ‘6. By way of derogation from paragraphs 1 and 4, the national competent authorities may authorise, under such conditions as they deem appropriate, the execution of an aircraft financial lease concluded before 26 February 2022 after having determined that: (a) it is strictly necessary to ensure lease re-payments to a legal person, entity or body incorporated or constituted under the law of a Member State which does not fall under any of the restrictive measures provided for in this Regulation; and (b) no economic resources will be made available to the Russian counterpart, with the exception of the transfer of ownership of the aircraft after full reimbursement of the financial lease. 7. The Member State concerned shall inform the other Member States and the Commission of any authorisations granted under this Article within two weeks of the authorisation. 8. The prohibition in paragraph 1 shall be without prejudice to Articles 2(4)(b) and 2a(4)(b).’;”

**(7) Rental Income**

[REDACTED]

**(8) Directors**

[REDACTED]

- 5m) Article 5m 1. It shall be prohibited to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary: (a) Russian nationals or natural persons residing in Russia; (b) legal persons, entities or bodies established in Russia; (c) legal persons, entities or bodies whose proprietary rights are directly or indirectly owned for more than 50 % by a natural or legal person, entity or body referred to in points (a) or (b); (d) legal persons, entities or bodies controlled by a natural or legal person, entity or body referred to in points (a), (b) or (c); (e) a natural or legal person, entity or body acting on behalf or at the direction of a natural or legal person, entity or body referred to in points (a), (b), (c) or (d). 2. It shall be prohibited as of 10 May 2022 to act as, or arrange for another person to act as, a trustee, nominee shareholder, director, secretary or a similar position, for a trust or similar legal arrangement as referred to in paragraph 1. 3. Paragraphs 1 and 2 shall not apply to the operations that are strictly necessary for the termination by 10 May 2022 of contracts which are not compliant with this Article concluded before 9 April 2022 or ancillary contracts necessary for the execution of such contracts. 4. Paragraphs 1 and 2 shall not apply when the trustor or beneficiary is a national of a Member State or a natural person having a temporary or permanent residence permit in a Member State. 5. By way of derogation from paragraphs 1 and 2, the competent authorities may authorise the services referred to therein, under such conditions as they deem appropriate, after having determined that this is necessary for:

**(9) Council regulation 2022/328 amending 833/2014 – Employment contract query.**

Article 3c Paragraph 4 states:

It shall be prohibited to:

- (a) Provide technical assistance, brokering services or other services related to the goods and technology referred to in paragraph (Aircraft) for any sale,

	<p>(b) supply, transfer of export of those goods and technology, <u>or for the provision of related technical assistance, brokering services or other services, directly or indirectly to any natural or legal person, entity or body in Russia of for the use in Russia.</u></p> <p>[REDACTED]</p>
Date of application	11/04/2022

**SECTION 2 – DETAILS OF THE APPLICANT(S)**

<p><b>Name of applicant(s)</b> (include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe DAC, No 2, Hume street, Dublin 2, Ireland – company number 512927</p>
<p><b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b></p>	<p>GTLK Europe DAC is 100% owned by JSC GTLK</p>
<p><b>Describe the nature of the business performed by the applicant</b></p>	<p>Fully service international leasing platform for both Aircraft and Vessels.</p>
<p><b>Contact Name</b></p>	<p>[REDACTED]</p>
<p><b>Address</b></p>	<p>Hume street, Dublin 2, Ireland</p>

<sup>1</sup> “Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

Telephone number	[REDACTED]
Email address	[REDACTED]

**SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT**

<p><b>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</b></p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</li> <li>e) other</li> </ul> <p><b>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</b></p> <ul style="list-style-type: none"> <li>f) Basic needs of the designated person,</li> <li>g) Reasonable professional fees for the provision of financial services,</li> <li>h) other</li> </ul>	<p><b><u>Salary payments</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Eurobond payments</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Professional service firms</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Other sundry expenses</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b><u>Portfolio sales</u> –</b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources</li> </ul>
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	<ul style="list-style-type: none"> <li>• of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p style="text-align: center;"><b><u>Rental Income</u></b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b>(10) <u>Directors</u></b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><b>(11) <u>Council regulation 2022/328 amending 833/2014 – Employment contract query.</u></b></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul>
<p><b>Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply ( “designated person”) and to whom the applicant has/had a relationship with</b></p>	<p>JSC GTLK. 100% owns GTLK Europe DAC</p>



Describe the nature of the relationship between the applicant and the designated person(s)	100% owned by the Designated entity.
Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided	Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.

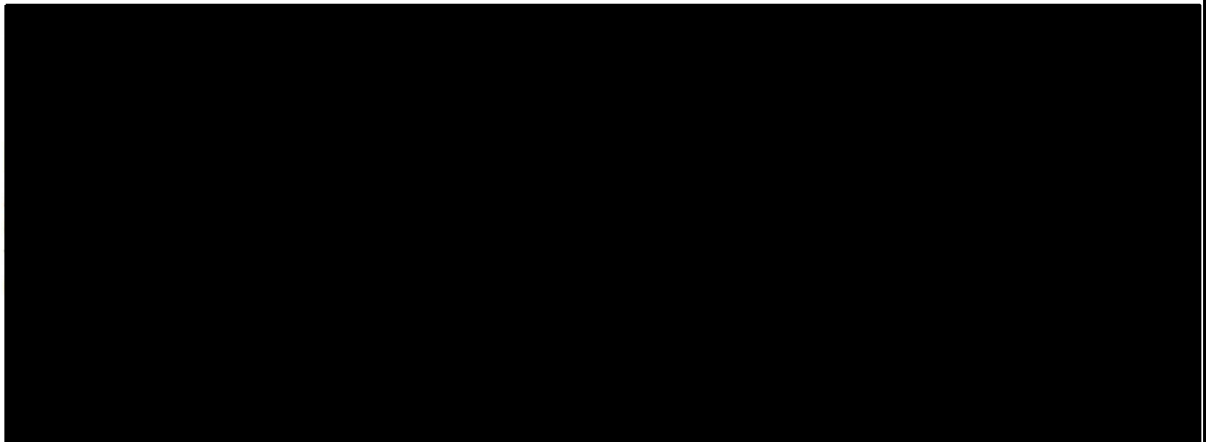
**SECTION 4 – DETAILS OF THE TRANSACTIONS(S) CONCERNED**

Date of contract	Various
Parties to the contract	<ul style="list-style-type: none"> <li>• Gtlk Europe DAC</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul>
Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.	Yes the company GTLK Europe DAC, which is 100% owned by JSC GTLK.
Date of the intended transaction(s).	[REDACTED] April and monthly thereafter.
Description of funds, economic resources or financial services to be supplied or obtained.	<p><u>Salary &amp; Sundry payments</u></p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul>

Account Name	Name of Bank	Account Number	IBAN	Swift	Currency
GTLK EUROPE DAC	[REDACTED], [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	EUR
GTLK EUROPE DAC	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	EUR

(1)

**Eurobond payment**



<p>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</p>	<p>No</p>
<p>Value of the economic resources or financial services to be supplied or obtained (in EUR).</p>	<ul style="list-style-type: none"> <li>• Eurobond [REDACTED]</li> <li>• Salary [REDACTED]</li> <li>• Professional service [REDACTED]</li> <li>• Rental [REDACTED]</li> </ul>
<p>Is the end user different from the contract customer?</p>	<p>Yes – end users are employees, landlord, service providers and investors.</p>
<p>Is the end user owned or controlled by a designated person?</p>	<p>[REDACTED]</p>

<p><b>Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?</b></p>	<p>“by a person acting on their behalf or at their direction, or by entities owned or controlled by them?”. [REDACTED]</p> <p>[REDACTED]</p>
<p><b>Dates of any transactions or shipments already made.</b></p>	<p>N/A</p>
<p><b>Dates of any future transactions or shipments.</b></p>	<p>N/A</p>

**SECTION 5 – BANKING DETAILS**

<p><b>Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)</b></p>	
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Salary payments

[Redacted text block containing salary payment details]


The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

The relevant bank accounts are:

Account Name	Name of Bank	Account Number	IBAN	Swift	Currency
GTLK EUROPE DAC	[Redacted]	[Redacted]	[Redacted]	[Redacted]	EUR
GTLK EUROPE DAC	[Redacted]	[Redacted]	[Redacted]	[Redacted]	EUR

Eurobond payment

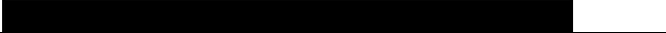

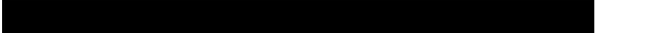

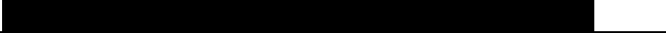

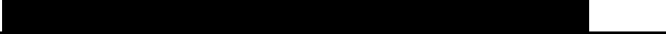


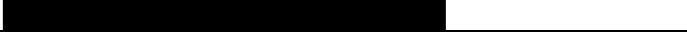

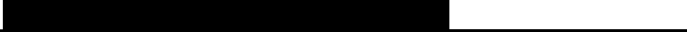
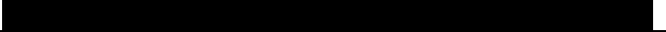

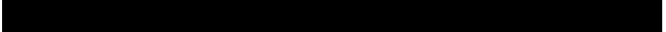



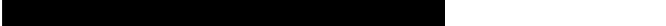

**SECTION 6 – FURTHER DETAILS**

<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	
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**SECTION 7 – DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
	
	
	
	
	
	
	
	
	
	



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

**Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**


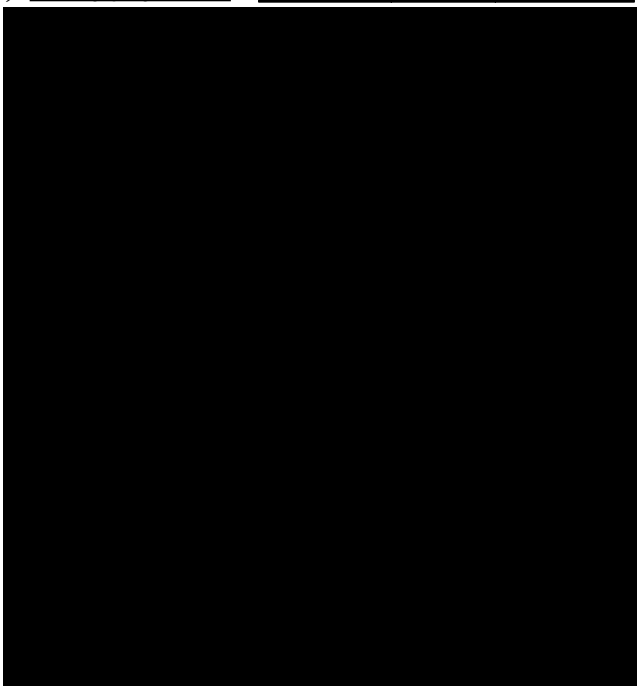
This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked "N/A".

The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)

**SECTION 1 - UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</p>	<p>(1) Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(2) Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(3) Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p>(1) <u>Salary payments</u> –  </p> <p>“6. Does the derogation in Article 6 of Council Regulation (EU) No 269/2014 allow for the payment of salaries of EU citizens by entities located in Member</p>



**States considered to be owned or controlled by a listed person?"**

Assets of an owned or controlled entity that are frozen because they were deemed to be controlled by the listed person can be released on the basis of an authorisation granted in line with Article 6 of Council Regulation (EU) No 269/2014, if the conditions specified therein are fulfilled, notably that payment is due under a contract or agreement that was concluded or an obligation that arose before the date on which the person was listed in Annex I to that Regulation; the frozen funds are used for a payment by a listed person (or in this case the owned/controlled entity), and the payment is not made towards any listed person.

**(2) Eurobond payments – [REDACTED]**

[REDACTED]

**(3) Professional service firms – [REDACTED]**

[REDACTED]

(4) Other sundry expenses – [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

|

(5) Portfolio sales – [REDACTED]  
[REDACTED]

|

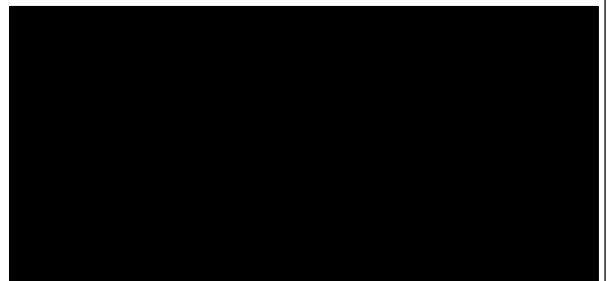
[REDACTED]

“10. By way of derogation from paragraphs 1 and 2, the competent authorities of a Member State may, under such conditions as they deem appropriate, authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, to a natural or legal person, entity or body listed in the Annex, after having determined that: (a) the funds or economic resources are necessary for the sale and transfer by 9 October 2022 of proprietary rights in a legal person, entity or body established in the Union where those proprietary rights are

directly or indirectly owned by a natural or legal person, entity or body listed in the Annex; and (b) the proceeds of such sale and transfer remain frozen.’;”


“Furthermore in Article 3c, the following paragraphs are added: ‘6. By way of derogation from paragraphs 1 and 4, the national competent authorities may authorise, under such conditions as they deem appropriate, the execution of an aircraft financial lease concluded before 26 February 2022 after having determined that: (a) it is strictly necessary to ensure lease re-payments to a legal person, entity or body incorporated or constituted under the law of a Member State which does not fall under any of the restrictive measures provided for in this Regulation; and (b) no economic resources will be made available to the Russian counterpart, with the exception of the transfer of ownership of the aircraft after full reimbursement of the financial lease. 7. The Member State concerned shall inform the other Member States and the Commission of any authorisations granted under this Article within two weeks of the authorisation. 8. The prohibition in paragraph 1 shall be without prejudice to Articles 2(4)(b) and 2a(4)(b).’;”

**(6) Rental Income**



**(7) Directors**

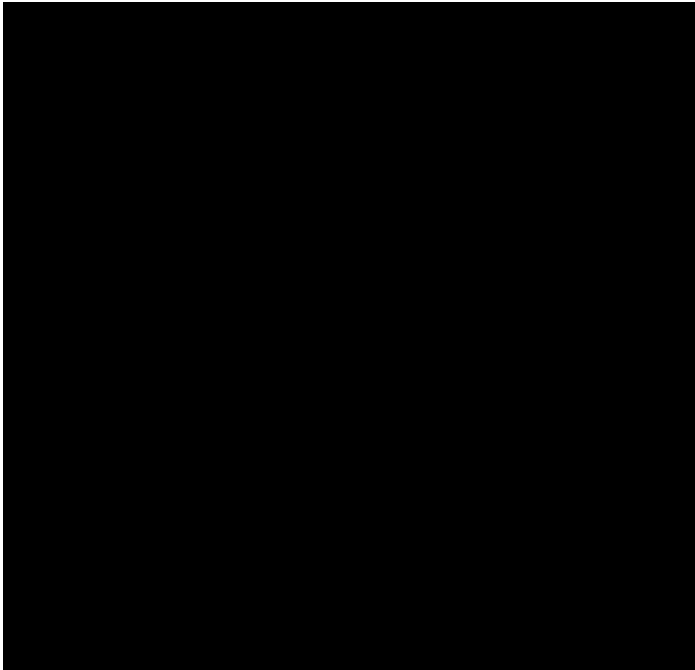


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- 5m) Article 5m 1. It shall be prohibited to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary: (a) Russian nationals or natural persons residing in Russia; (b) legal persons, entities or bodies established in Russia; (c) legal persons, entities or bodies whose proprietary rights are directly or indirectly owned for more than 50 % by a natural or legal person, entity or body referred to in points (a) or (b); (d) legal persons, entities or bodies controlled by a natural or legal person, entity or body referred to in points (a), (b) or (c); (e) a natural or legal person, entity or body acting on behalf or at the direction of a natural or legal person, entity or body referred to in points (a), (b), (c) or (d). 2. It shall be prohibited as of 10 May 2022 to act as, or arrange for another person to act as, a trustee, nominee shareholder, director, secretary or a similar position, for a trust or similar legal arrangement as referred to in paragraph 1. 3. Paragraphs 1 and 2 shall not apply to the operations that are strictly necessary for the termination by 10 May 2022 of contracts which are not compliant with this Article concluded before 9 April 2022 or ancillary contracts necessary for the execution of such contracts. 4. Paragraphs 1 and 2 shall not apply when the trustor or beneficiary is a national of a Member State or a natural person having a temporary or permanent residence permit in a Member State. 5. By way of derogation from paragraphs 1 and 2, the competent authorities may authorise the services referred to therein, under such conditions as they deem appropriate, after having determined that this is necessary for:

**(8) Council regulation 2022/328 amending 833/2014 – Employment contract query.**

Article 3c Paragraph 4 states:

It shall be prohibited to:

	<p>(a) Provide technical assistance, brokering services or other services related to the goods and technology referred to in paragraph (Aircraft) for any sale, supply, transfer or export of those goods and technology, <b><u>or for the provision of related technical assistance, brokering services or other services, directly or indirectly to any natural or legal person, entity or body in Russia of for the use in Russia.</u></b></p> 
Date of application	11/04/2022

## SECTION 2 - DETAILS OF THE APPLICANT(S)

<b>Name of applicant(s)</b> <b>(include individual name and/or company name, together with registration number and any other identifying information)</b>	GTLK Europe DAC, No 2, Hume street, Dublin 2, Ireland  – company number 512927
<b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b>	GTLK Europe DAC is 100% owned by JSC GTLK

<sup>1</sup>“Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

Describe the nature of the business performed by the applicant	Fully service international leasing platform for both Aircraft and Vessels.
Contact Name	[REDACTED]
Address	Hume street, Dublin 2, Ireland
Telephone number	[REDACTED]
Email address	[REDACTED]

### SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT

<p>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</p> <ol style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</li> <li>e) other</li> </ol> <p>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</p> <ol style="list-style-type: none"> <li>f) Basic needs of the designated person,</li> <li>g) Reasonable professional fees for the provision of financial services,</li> <li>h) other</li> </ol>	<p><u>Salary payments –</u></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><u>Eurobond payments –</u></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><u>Professional service firms –</u></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.</li> </ul> <p><u>Other sundry expenses –</u></p> <ul style="list-style-type: none"> <li>• Basic needs of the designated person.</li> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> </ul>
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- To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.

**Portfolio sales –**

- Basic needs of the designated person.
- To release frozen funds or economic resources of a designated person to or for the benefit of a third party.
- To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.

**Rental Income**

- Basic needs of the designated person.
- To release frozen funds or economic resources of a designated person to or for the benefit of a third party.
- To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.

**(9) Directors**



- Basic needs of the designated person.
- To release frozen funds or economic resources of a designated person to or for the benefit of a third party.
- To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.

**(10) Council regulation 2022/328 amending 833/2014 – Employment contract query.**

- Basic needs of the designated person.
- To release frozen funds or economic resources of a designated person to or for the benefit of a third party.
- To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person.

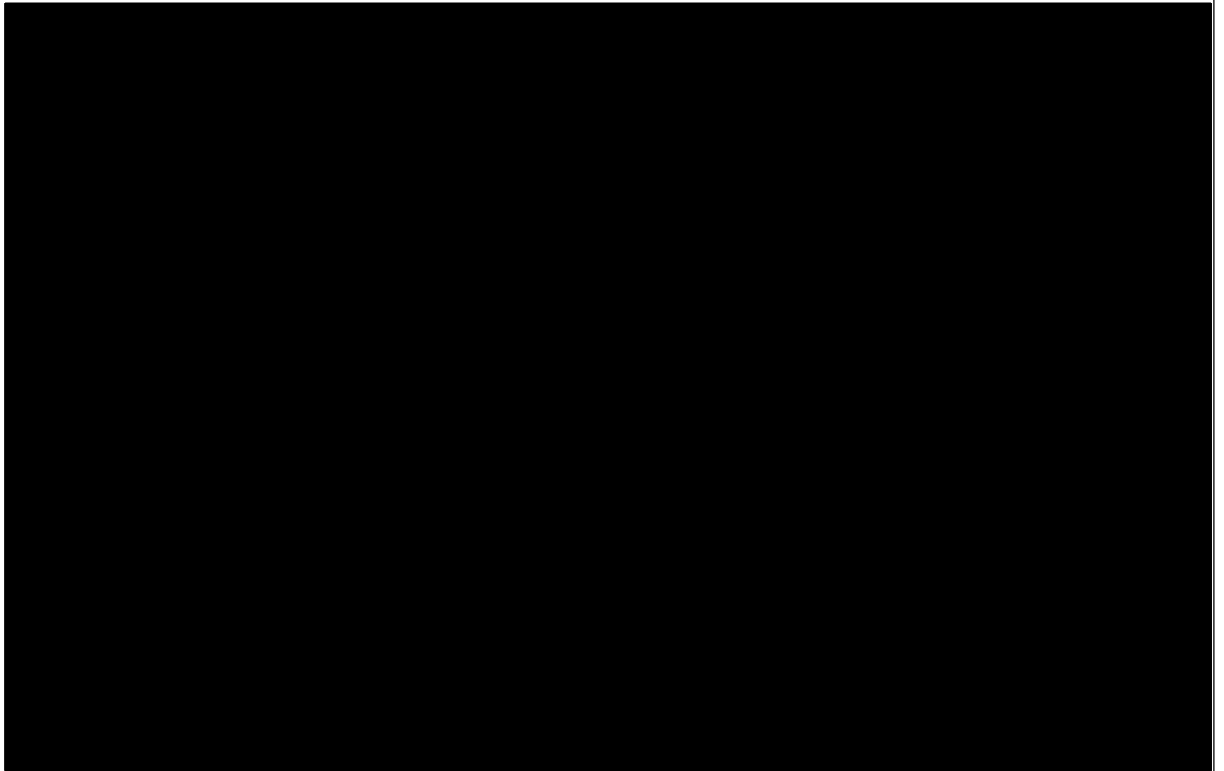
Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply (“designated person”) and to whom the applicant has/had a relationship with	JSC GTLK. 100% owns GTLK Europe DAC
Describe the nature of the relationship between the applicant and the designated person(s)	100% owned by the Designated entity.
Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided	Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.

#### SECTION 4 – DETAILS OF THE TRANSACTIONS(S) CONCERNED

Date of contract	Various
Parties to the contract	<ul style="list-style-type: none"> <li>Gtlk Europe DAC</li> </ul> 
Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.	<i>Yes the company GTLK Europe DAC, which is 100% owned by JSC GTLK.</i>
Date of the intended transaction(s)	 April and monthly thereafter.



Salary & Sundry payments



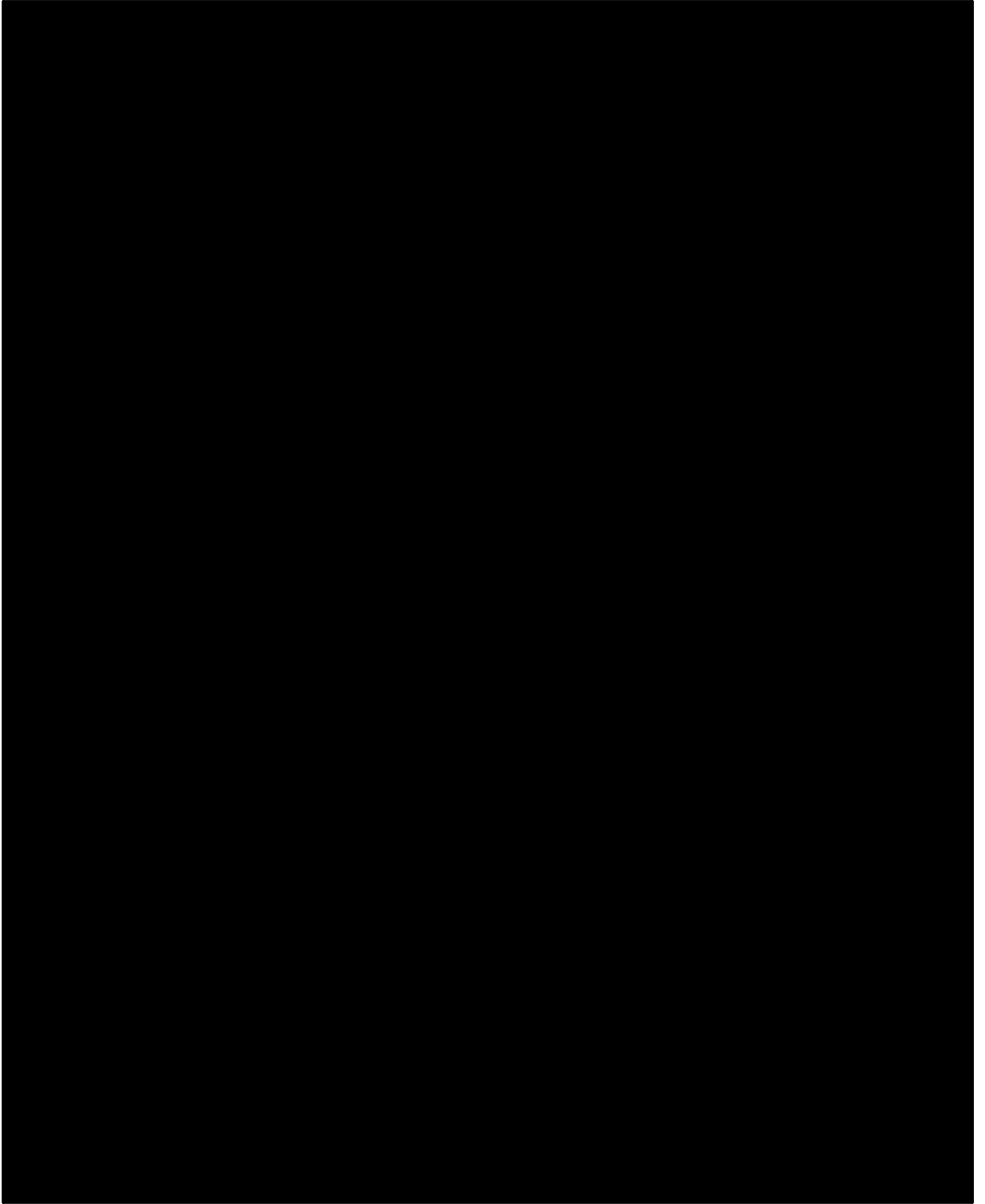
Description of funds, economic resources or financial services to be supplied or obtained.

The relevant bank accounts are:

Account Name	Name of Bank	Account Number	IBAN	Swift	Currency
GTLK EUROPE DAC					
GTLK EUROPE DAC					

(1)

**Eurobond payment**



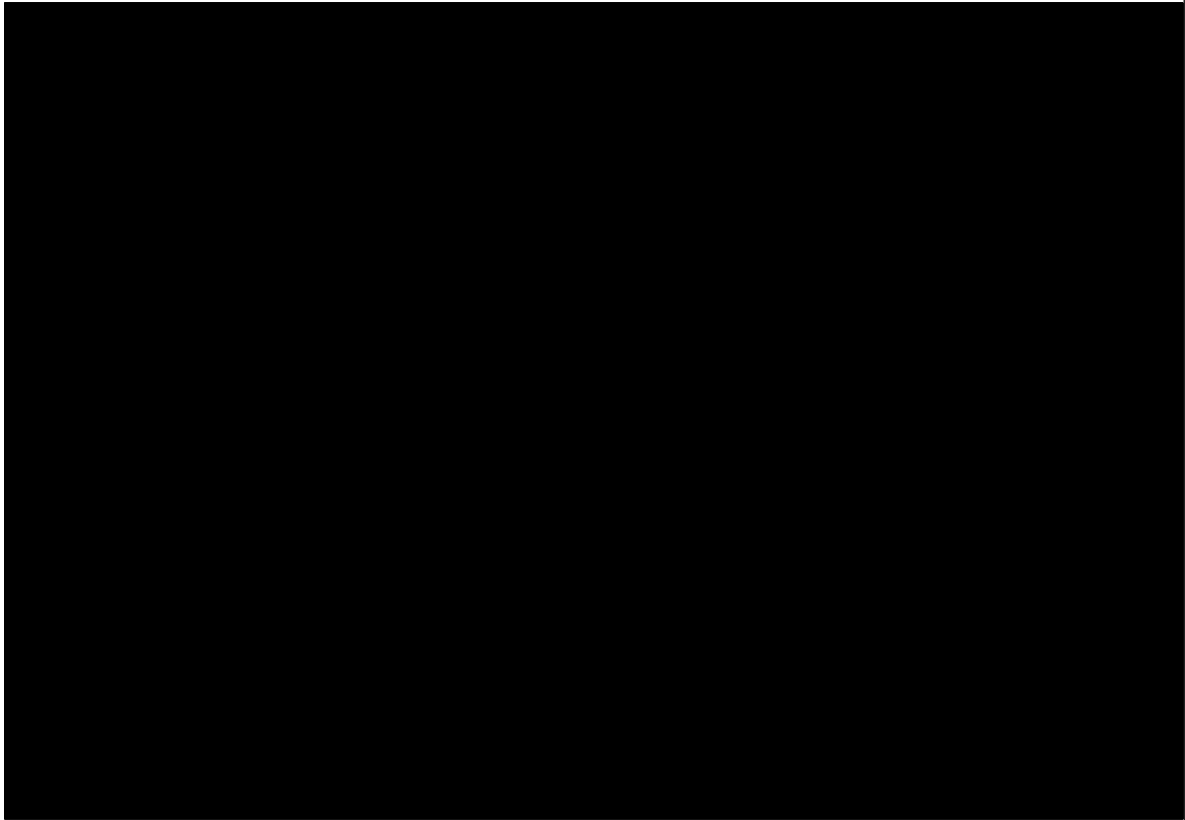
<p>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</p>	<p>No</p>
<p>Value of the economic resources or financial services to be supplied or obtained (in EUR).</p>	<ul style="list-style-type: none"> <li>• Eurobond - [REDACTED]</li> <li>• Salary - [REDACTED]</li> <li>• Professional service - [REDACTED]</li> <li>• Rental - [REDACTED]</li> </ul>
<p>Is the end user different from the contract customer?</p>	<p>Yes – end users are employees, landlord, service providers and investors.</p>
<p>Is the end user owned or controlled by a designated person?</p>	<p>[REDACTED]</p>

<p>Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?</p>	<p>“by a person acting on their behalf or at their direction, or by entities owned or controlled by them?”. [REDACTED]</p> <p>[REDACTED]</p>
<p>Dates of any transactions or shipments already made.</p>	<p>N/A</p>
<p>Dates of any future transactions or shipments.</p>	<p>N/A</p>

**SECTION 5 – BANKING DETAILS**

<p>Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)</p>	
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Salary payments

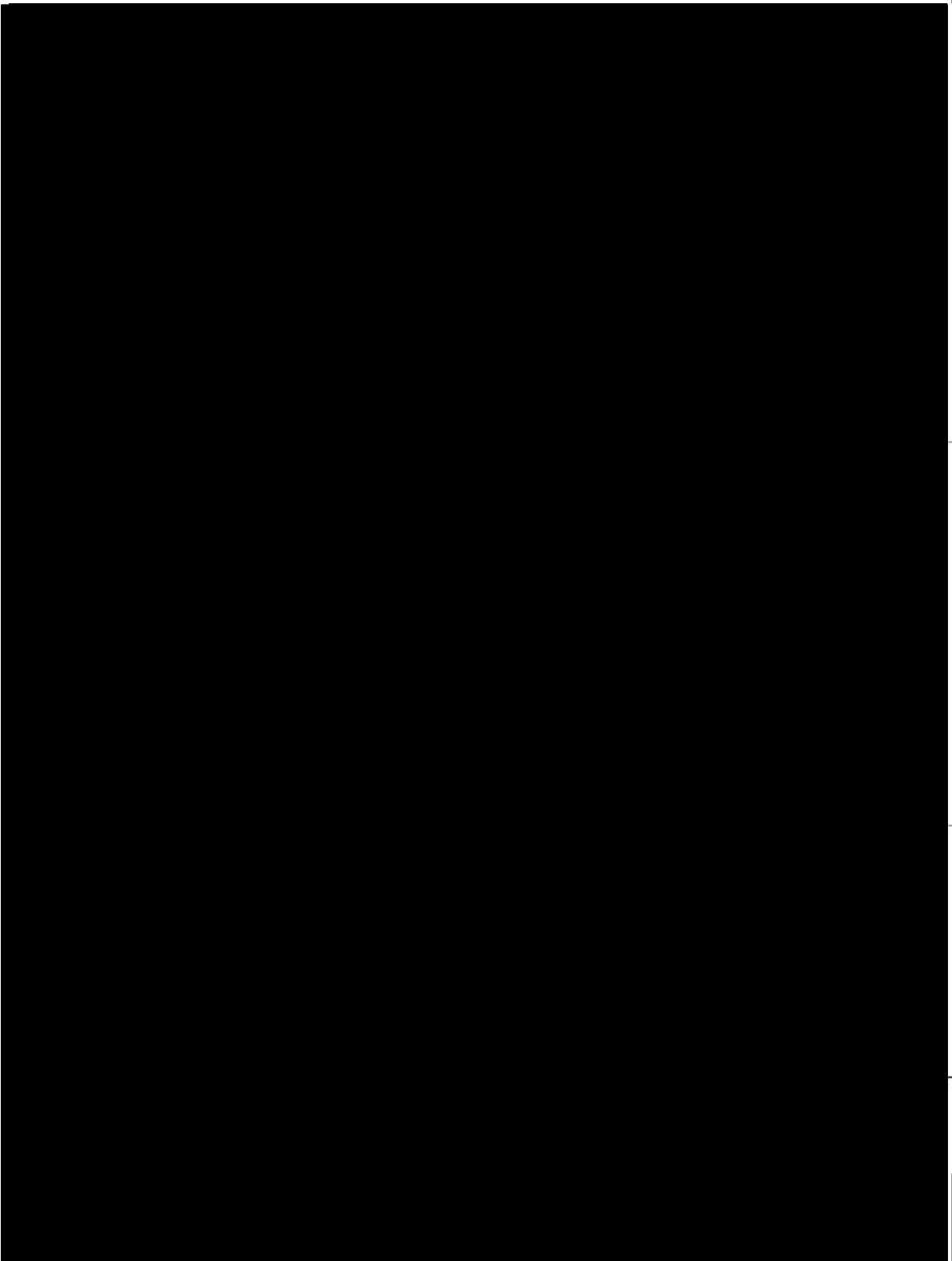


The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

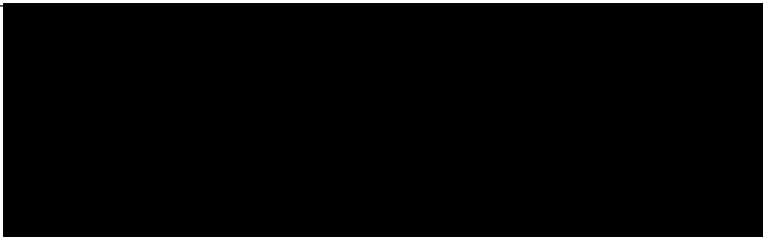
The relevant bank accounts are:

Account Name	Name of Bank	Account Number	IBAN	Swift	Currency
GTLK EUROPE DAC					
GTLK EUROPE DAC					

**Eurobond payment**



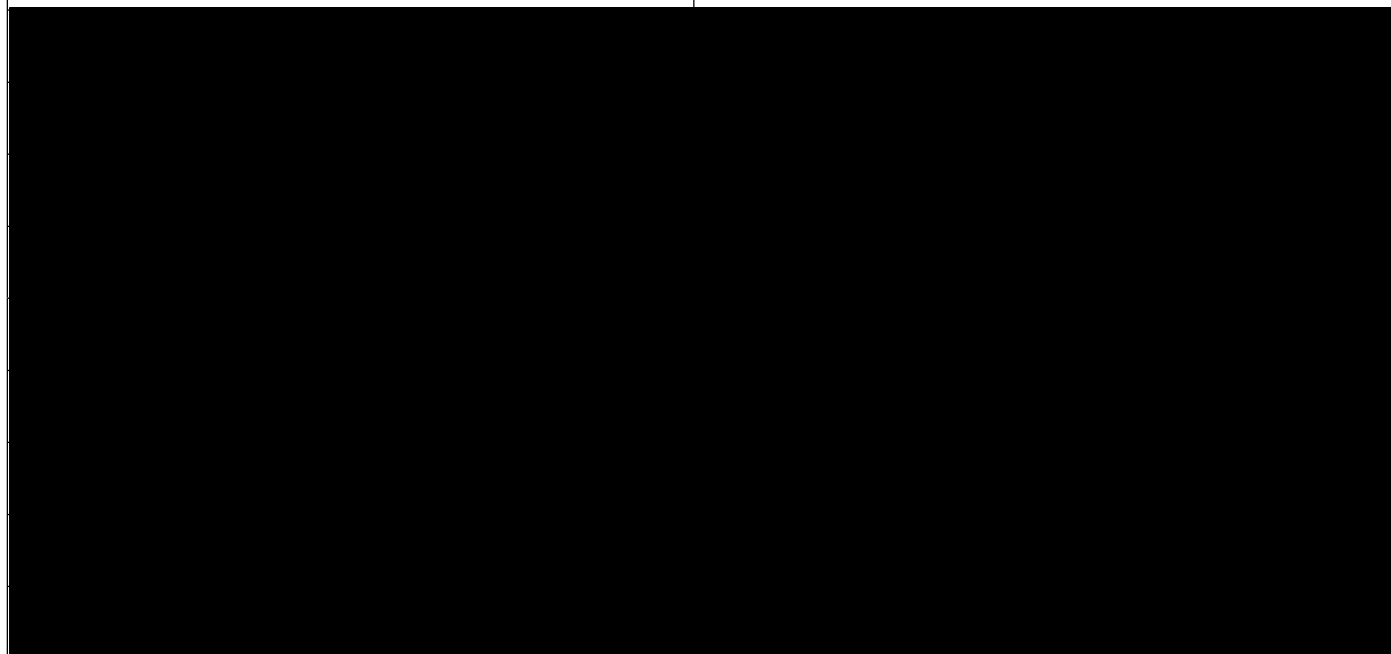
**SECTION 6 – FURTHER DETAILS**

<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	
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**SECTION 7 – DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
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- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

<b>Document name</b>	<b>Explanation of document/relevance to application</b>
	



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

**Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked "N/A".

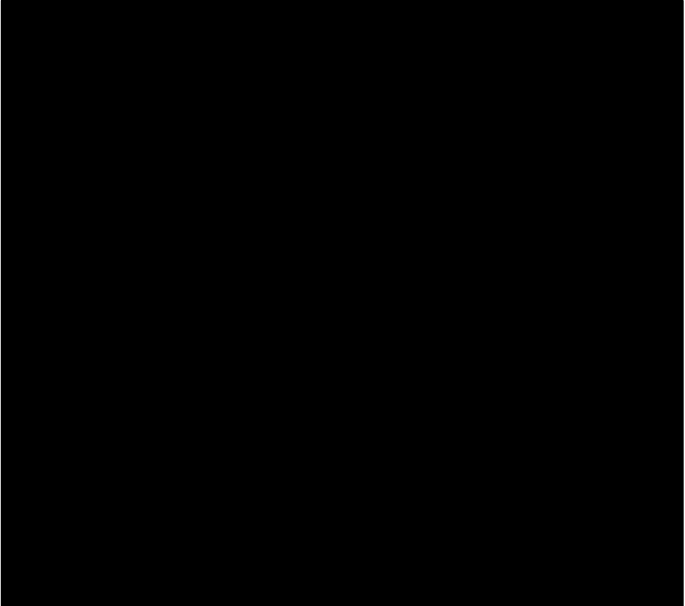
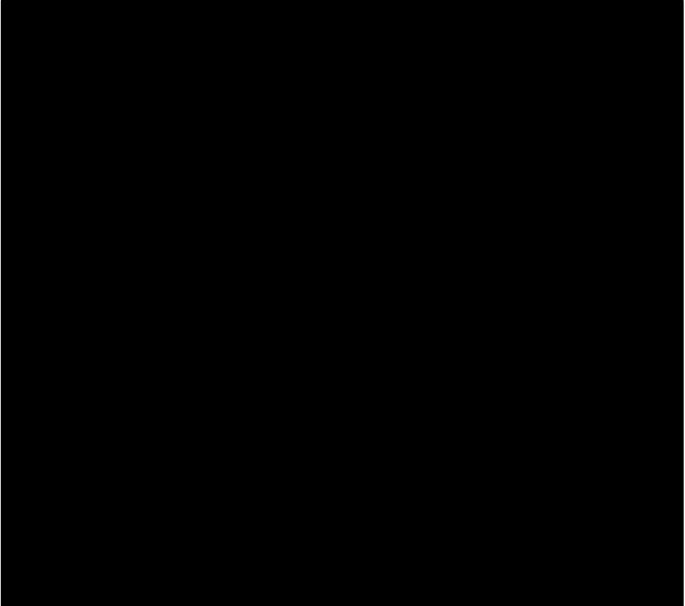
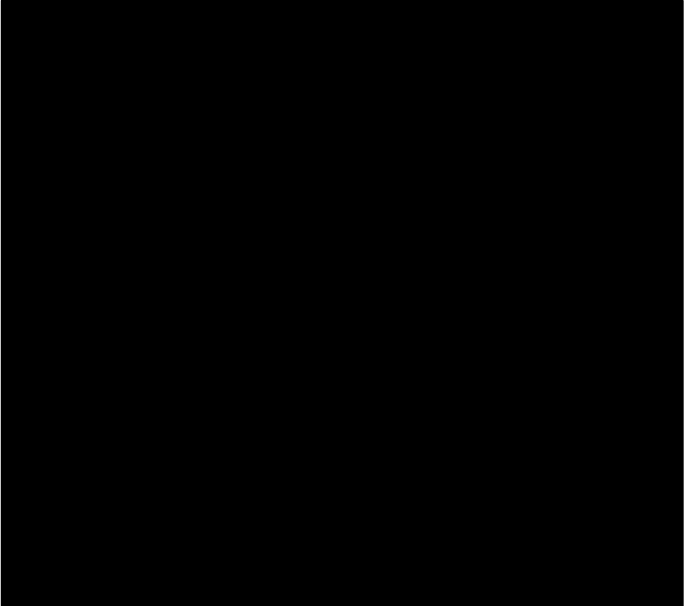
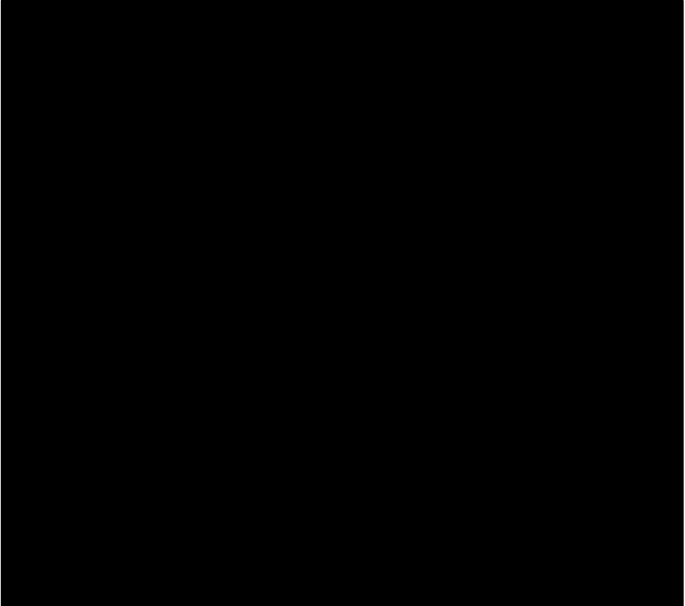
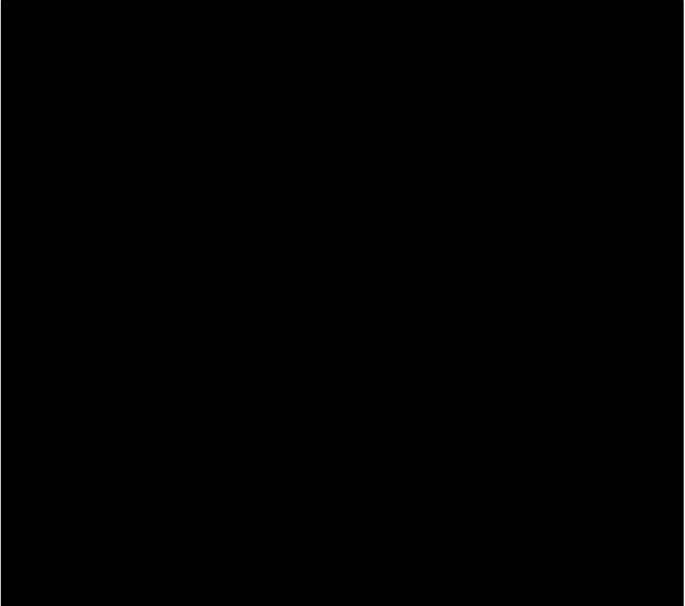
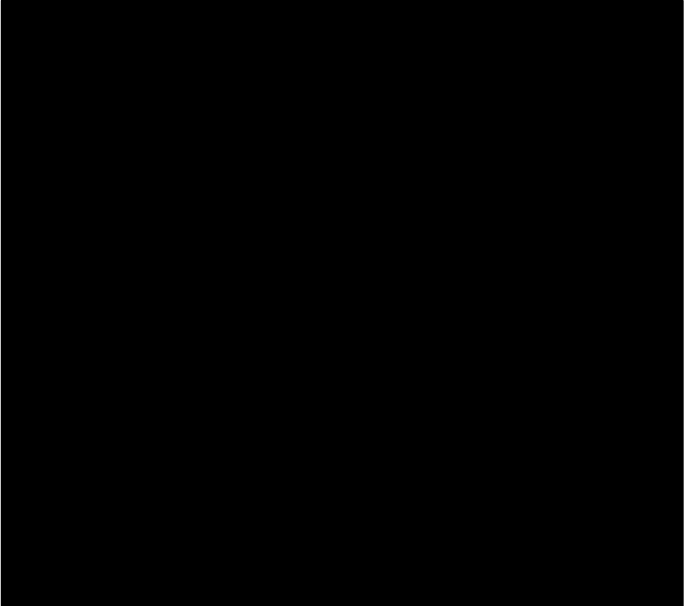
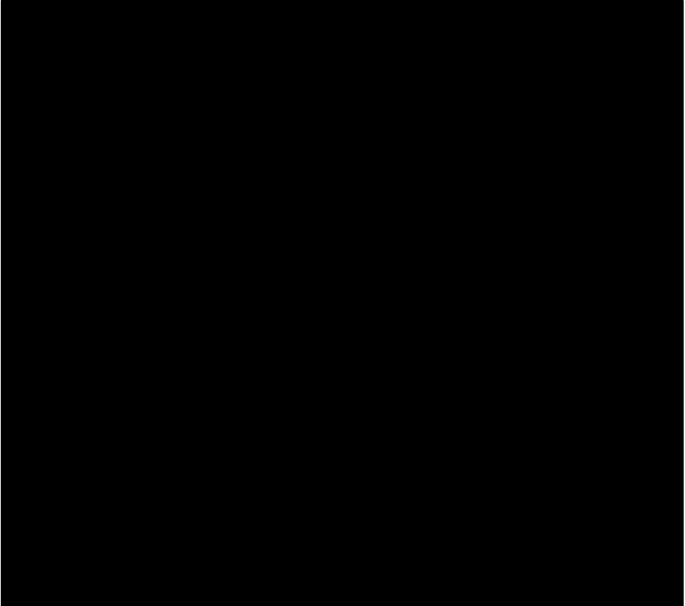
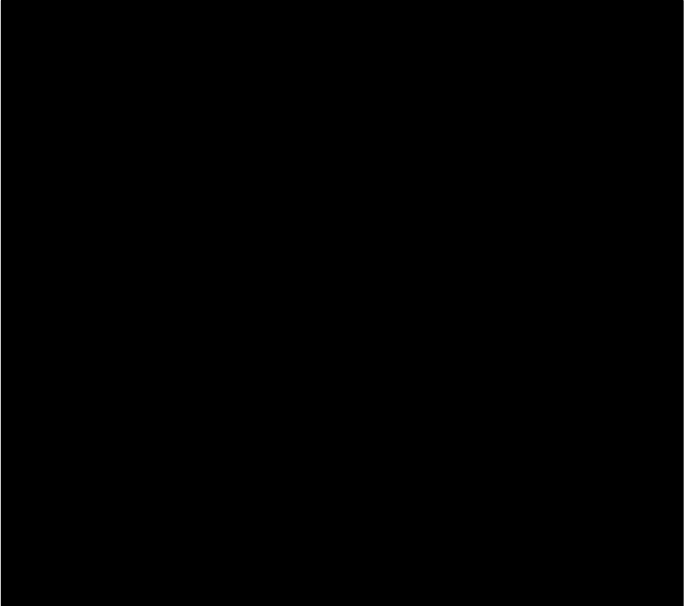
The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)



**SECTION 1 – UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</p>	<p>(1) Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(2) Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(3) Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p>1. </p> <p>2. </p> <p>3. </p> <p>4. </p> <p>5. </p> <p>6. </p> <p>7. </p> <p>8. </p>
<p>Date of application</p>	<p>28.04.2022</p>

**SECTION 2 – DETAILS OF THE APPLICANT(S)**

<p><b>Name of applicant(s)</b></p> <p>(include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe Designated Activity Company, a company incorporated and existing under the laws of Ireland (registered number 512927), having its registered office at 2 Hume Street, Dublin 2, Ireland.</p>
<p><b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b></p>	<p>GTLK Europe DAC is 100% owned by GTLK JSC.</p>
<p><b>Describe the nature of the business performed by the applicant</b></p>	<p>Fully service international leasing platform for both Aircraft and Vessels.</p>
<p><b>Contact Name</b></p>	<p>██████████</p>
<p><b>Address</b></p>	<p>2 Hume street, Dublin 2, Ireland</p>
<p><b>Telephone number</b></p>	<p>██████████</p>
<p><b>Email address</b></p>	<p>██████████</p>

**SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT**









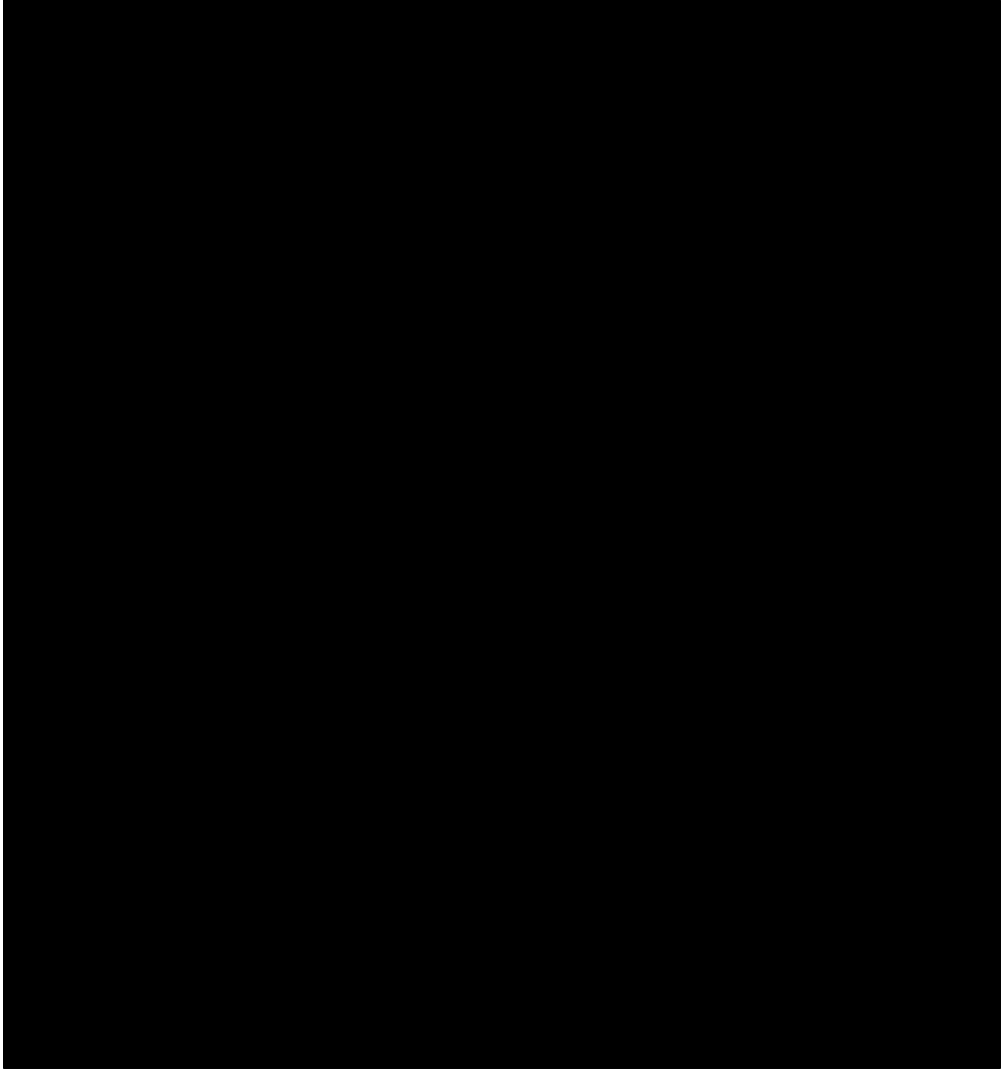
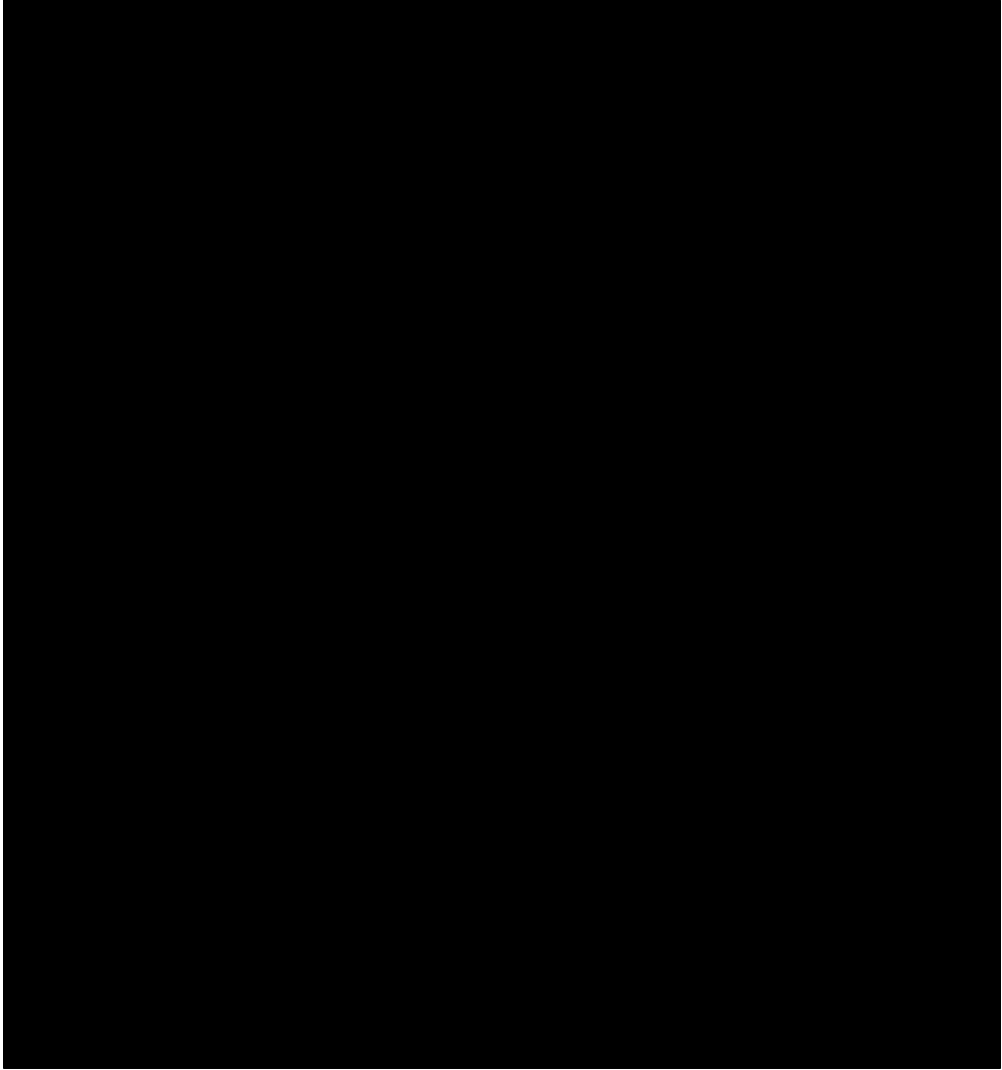
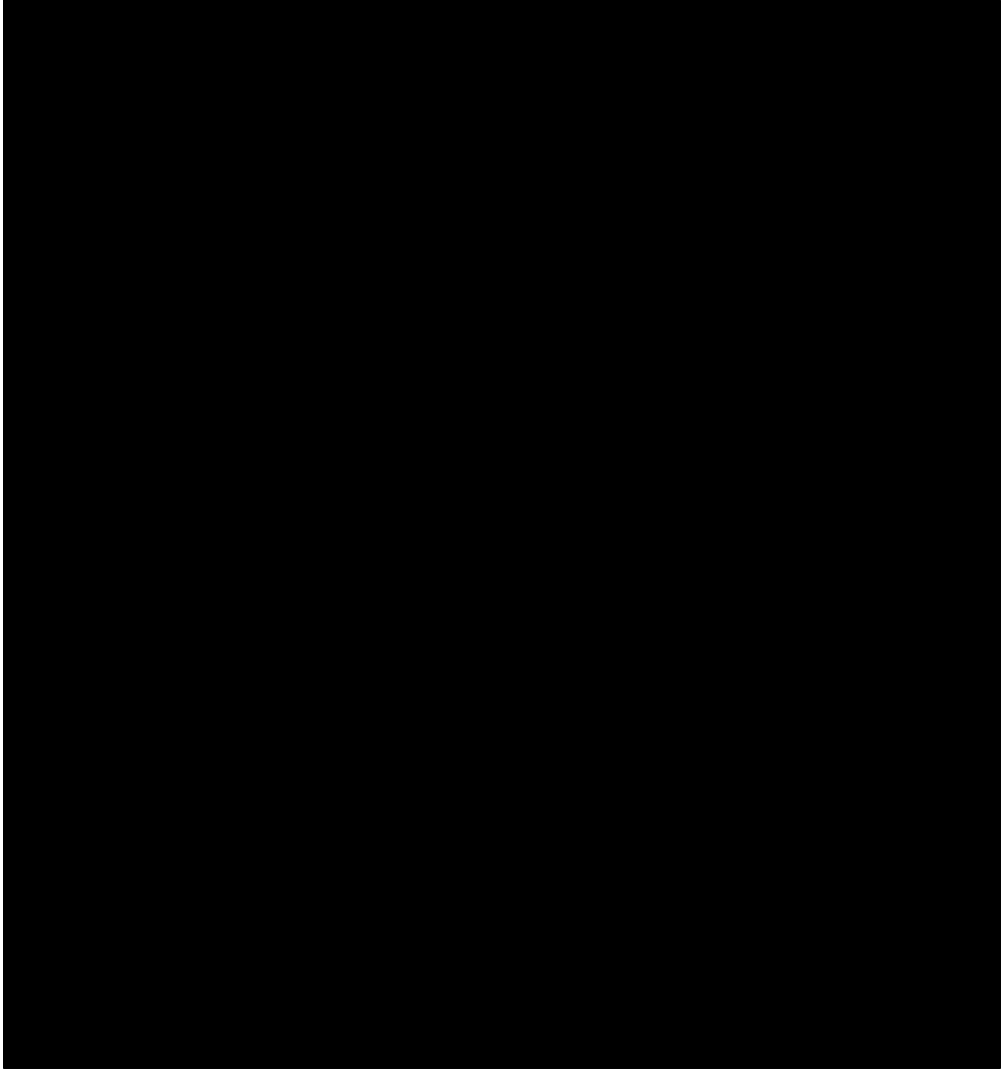
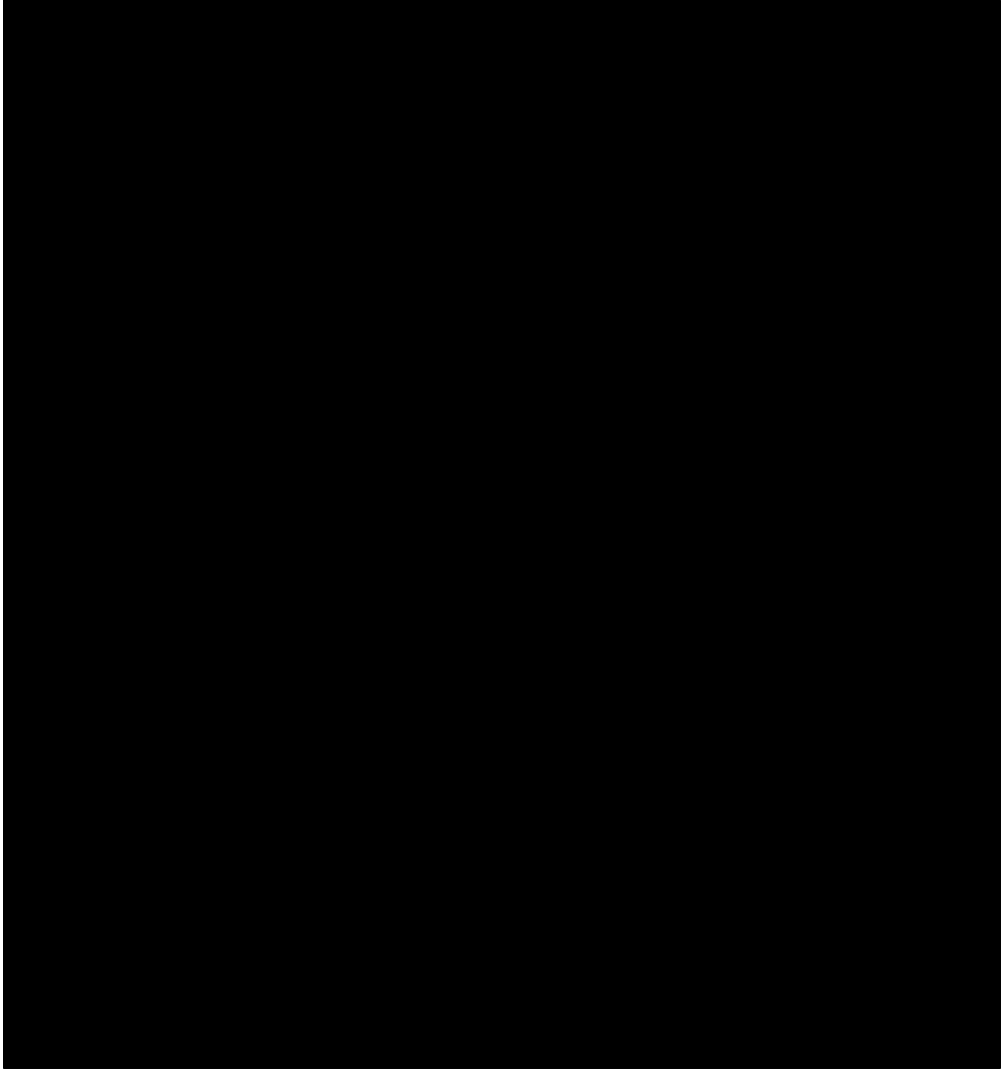
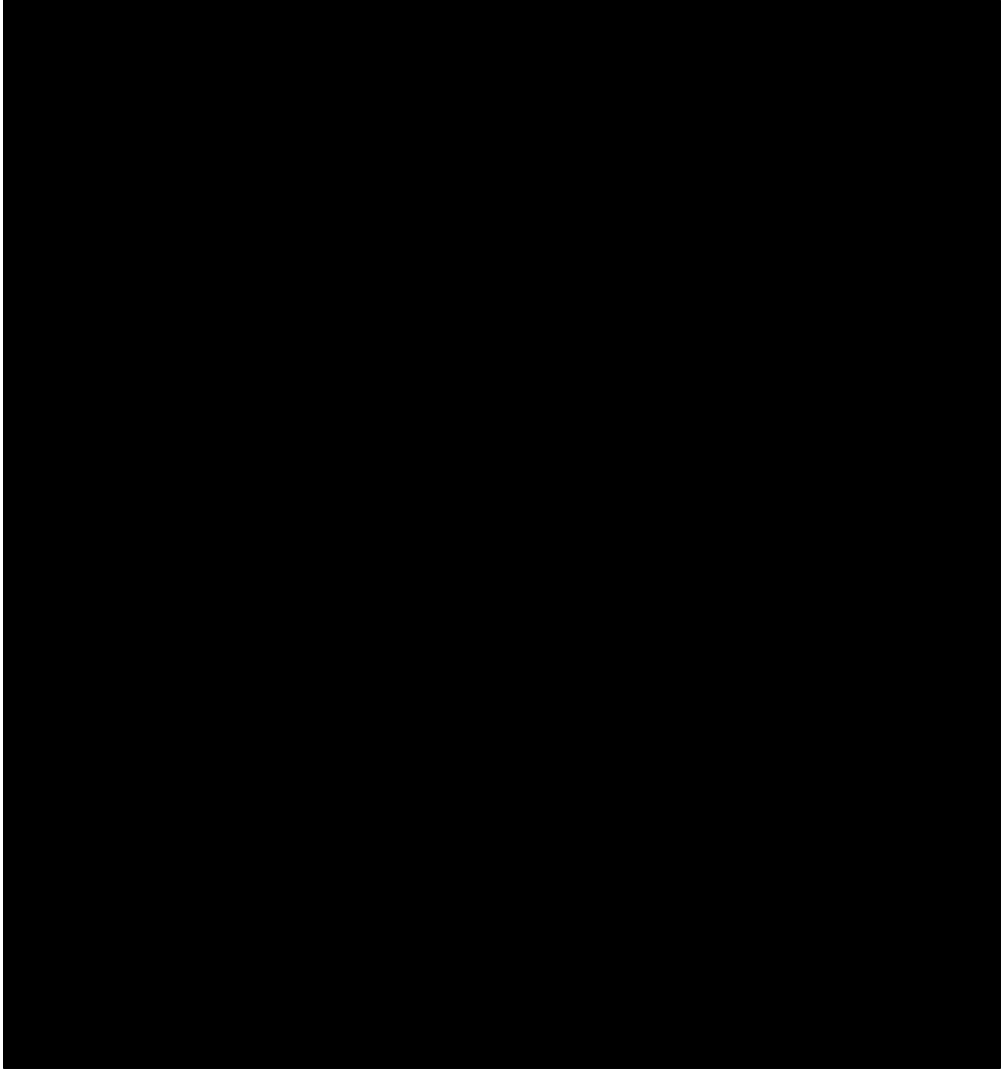
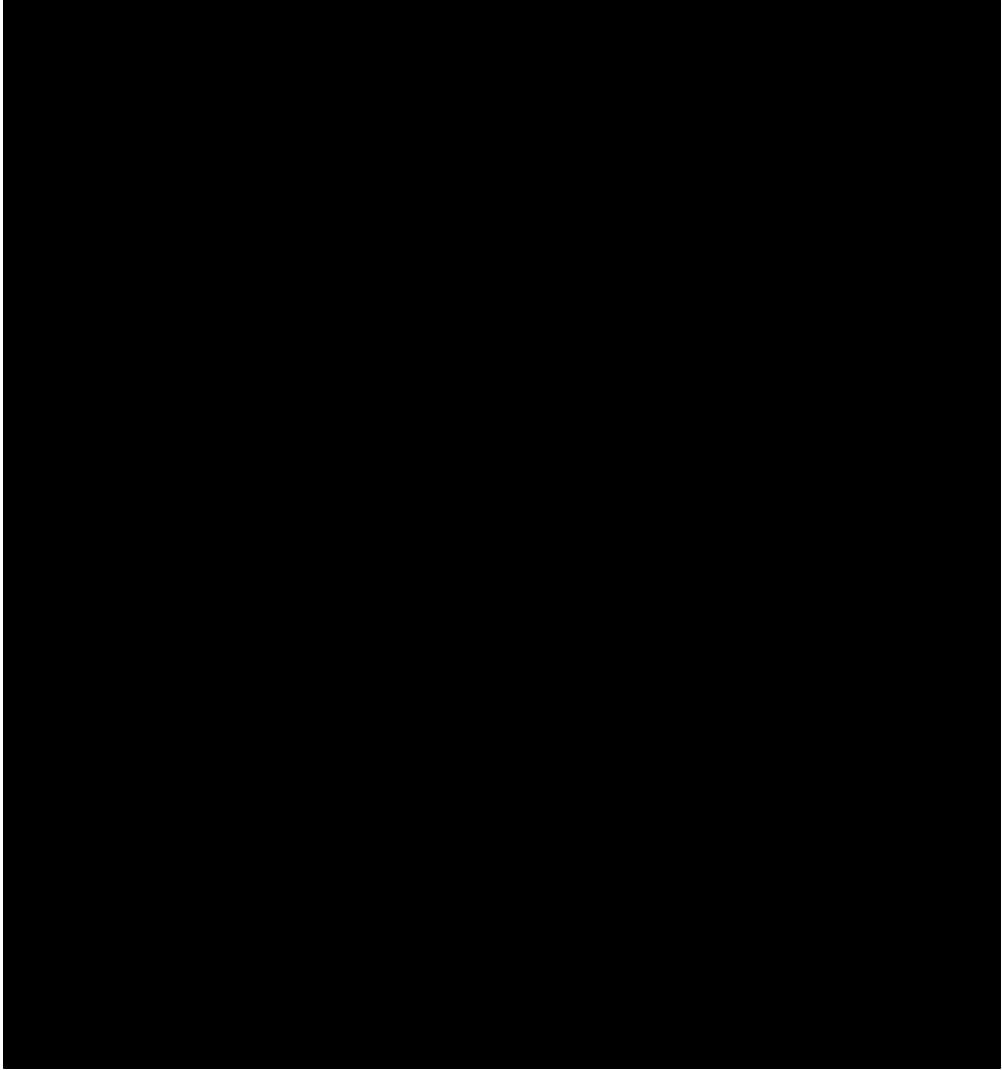
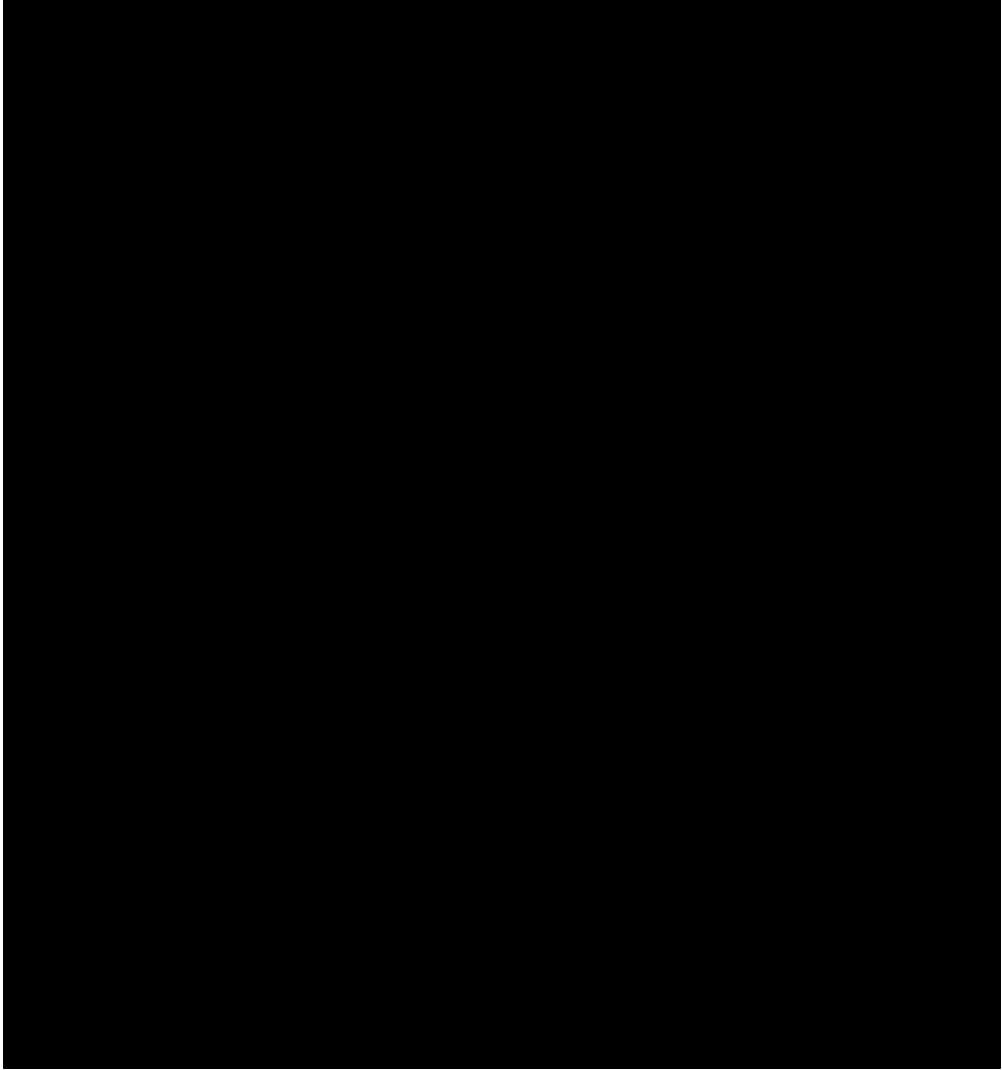
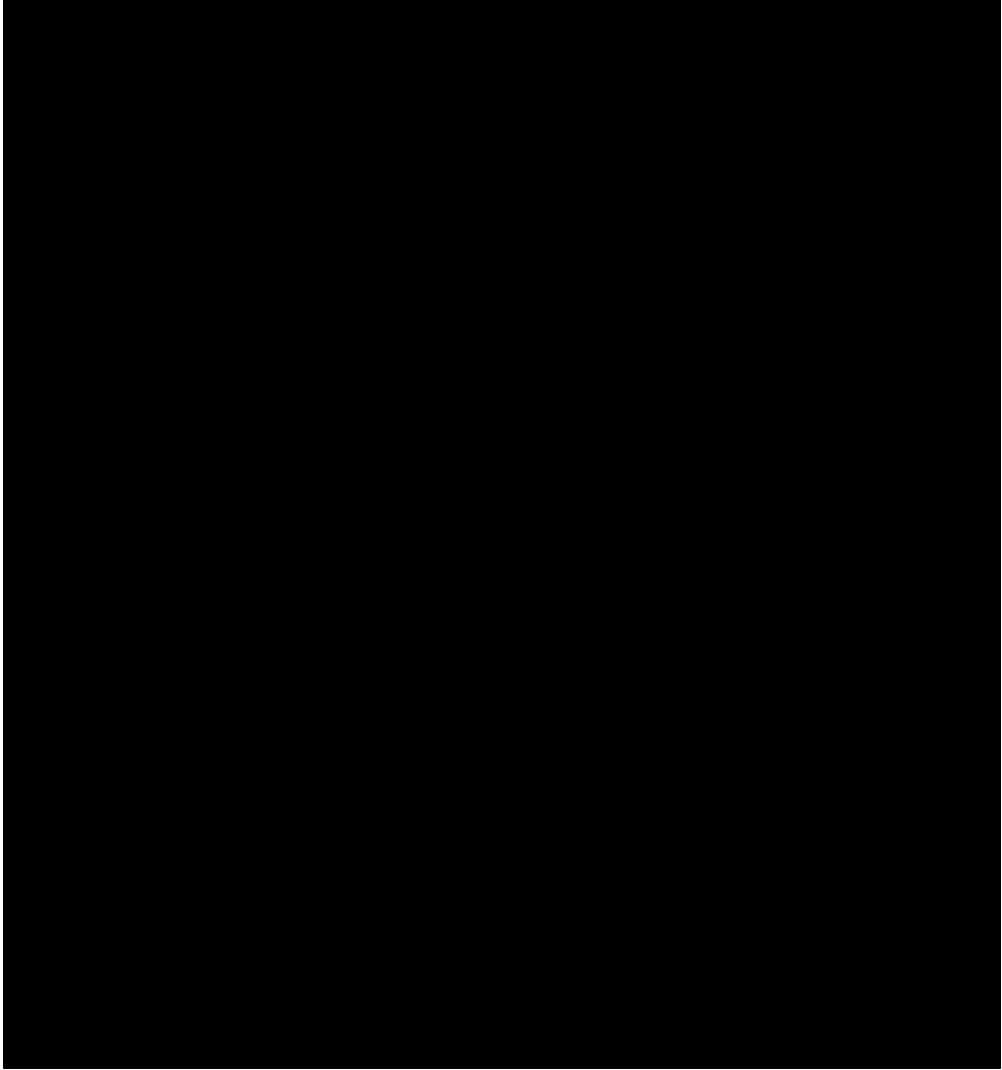
<p><b>Describe the reason for derogation/authorisation application.</b> Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> </ul>	<ul style="list-style-type: none"> <li>a) To release frozen funds of a designated person for the benefit of a third party.</li> <li>f) Basic needs of the designated person.</li> </ul>
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<sup>1</sup>“Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

<p>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</p> <p>e) other</p> <p>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</p> <p>f) Basic needs of the designated person,</p> <p>g) Reasonable professional fees for the provision of financial services,</p> <p>h) other</p>	
<p>Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply (“designated person”) and to whom the applicant has/had a relationship with</p>	<p>GTLK JSC.</p>
<p>Describe the nature of the relationship between the applicant and the designated person(s)</p>	<p>GTLK Europe DAC is 100% owned by the Designated entity.</p>
<p>Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided</p>	<p>Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.</p>

**SECTION 4 - DETAILS OF THE TRANSACTIONS(S) CONCERNED**


<p>Date of contract</p>	<ol style="list-style-type: none"> <li>1.</li> <li>2.</li> <li>3.</li> <li>4.</li> <li>5.</li> <li>6.</li> <li>7.</li> <li>8.</li> </ol> 
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<p><b>Parties to the contract</b></p>	<ol style="list-style-type: none"> <li>1. GTLK Europe DAC</li> <li>2. </li> <li>3. </li> <li>4. </li> <li>5. </li> <li>6. </li> <li>7. </li> <li>8. </li> <li>9. </li> </ol>
<p><b>Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.</b></p>	<p>Yes, GTLK Europe DAC is 100% owned by JSC GTLK.</p>
<p><b>Date of the intended transaction(s).</b></p>	<ol style="list-style-type: none"> <li>1. </li> <li>2. </li> <li>3. </li> <li>4. </li> <li>5. </li> <li>6. </li> <li>7. </li> <li>8. </li> </ol>

<b>Description of funds, economic resources or financial services to be supplied or obtained.</b>	<table border="1"> <thead> <tr> <th>Service provider</th> <th>Service type</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="background-color: black; height: 300px;"></td> </tr> </tbody> </table>			Service provider	Service type	Description			
	Service provider	Service type	Description						
<b>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</b>	No								

Value of the economic resources or financial services to be supplied or obtained (in EUR).	Service provider	Service type	Service type	Due date	Amount
Is the end user different from the contract customer?	No				
Is the end user owned or controlled by a designated person?	No, GTLK Europe is only designated person				



<p>Dates of any future transactions or shipments.</p>	 
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**SECTION 5 - BANKING DETAILS**

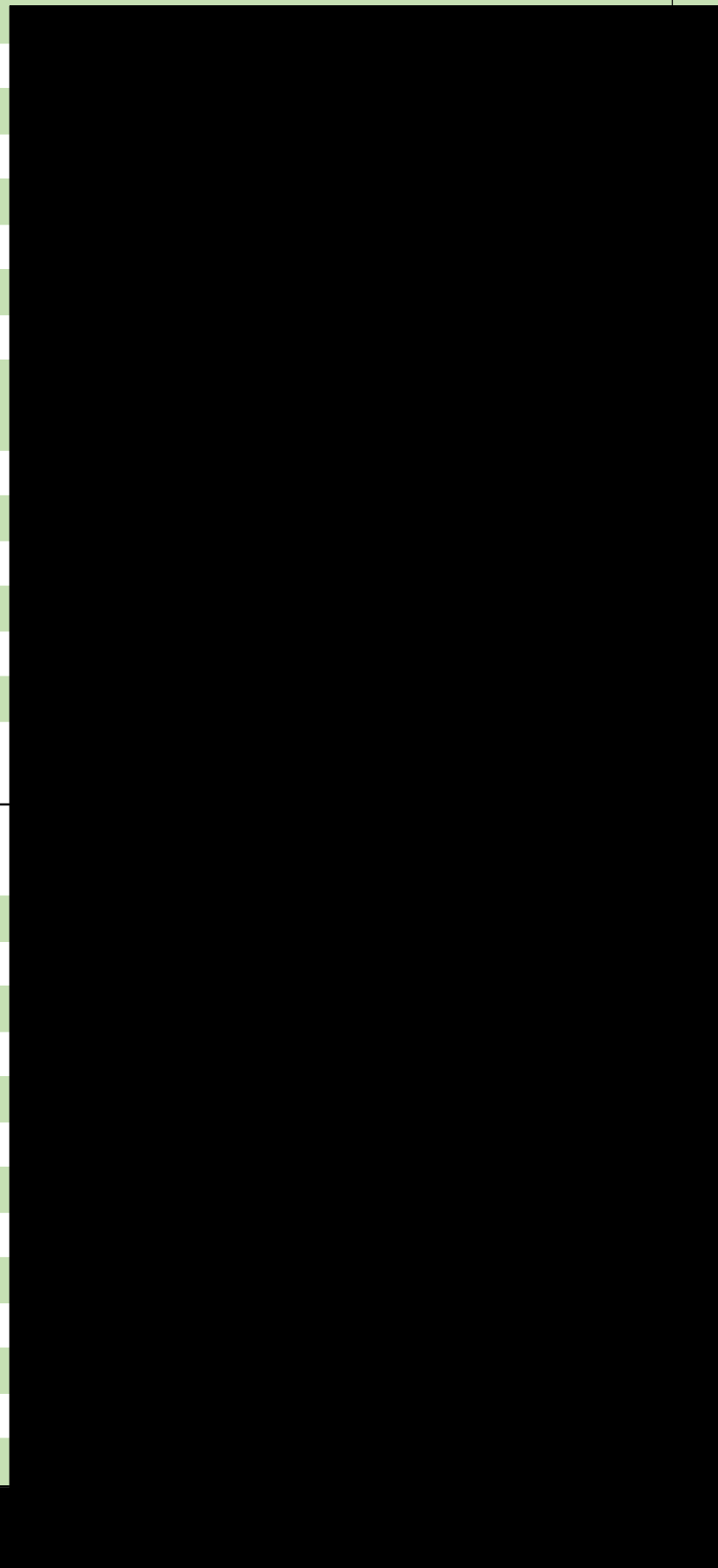
<p>Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)</p>	<p>bank/electronic transfer</p>
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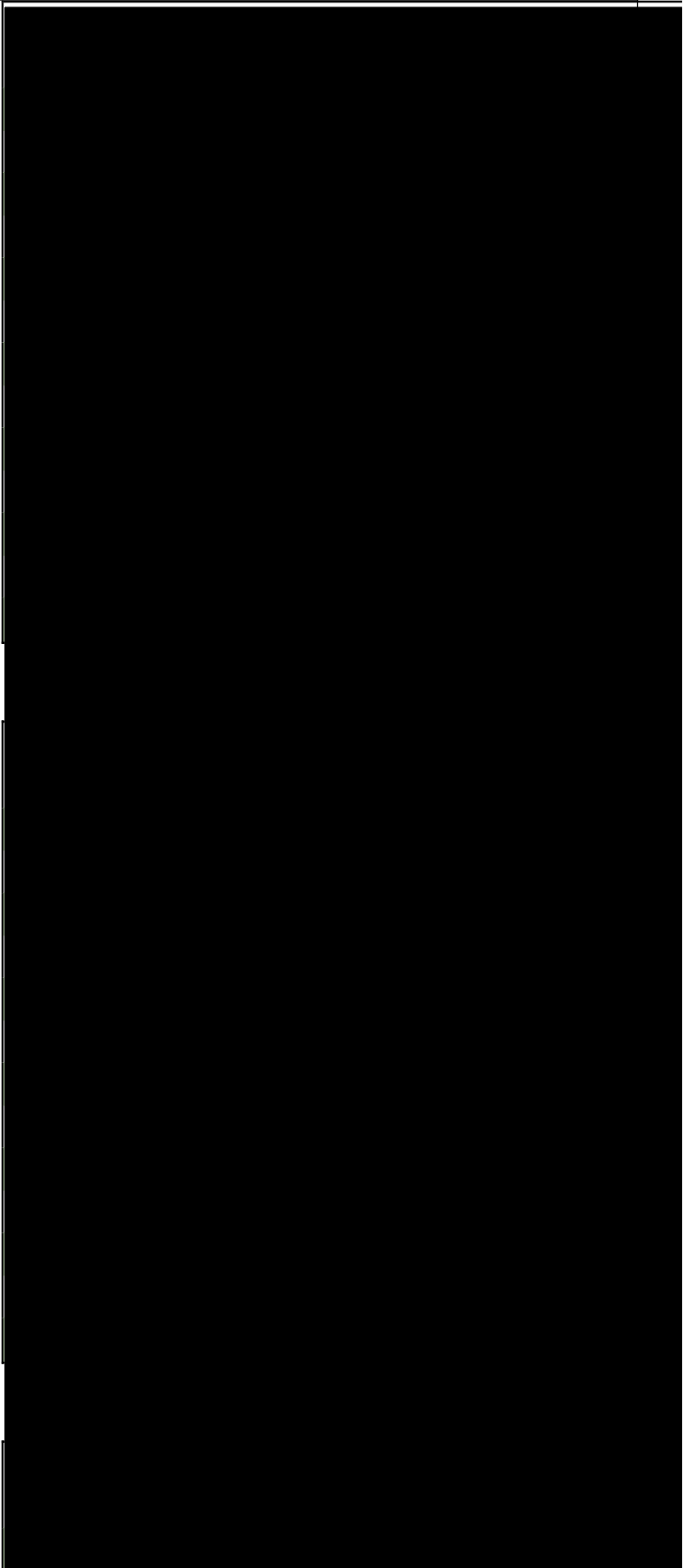
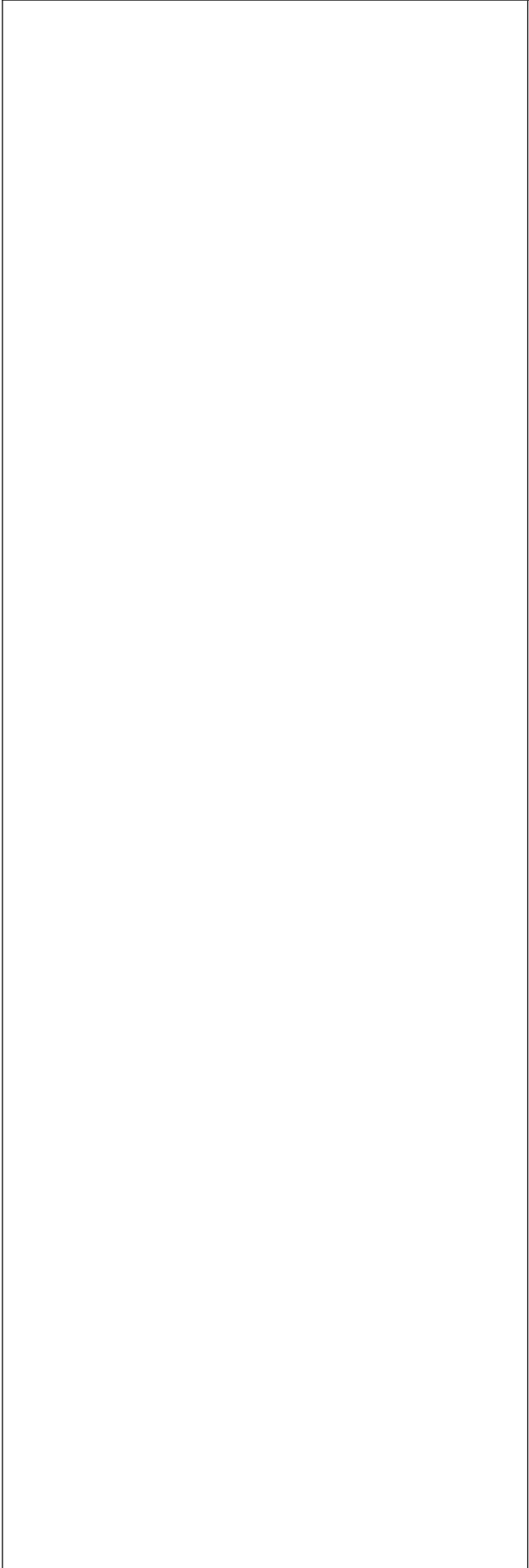


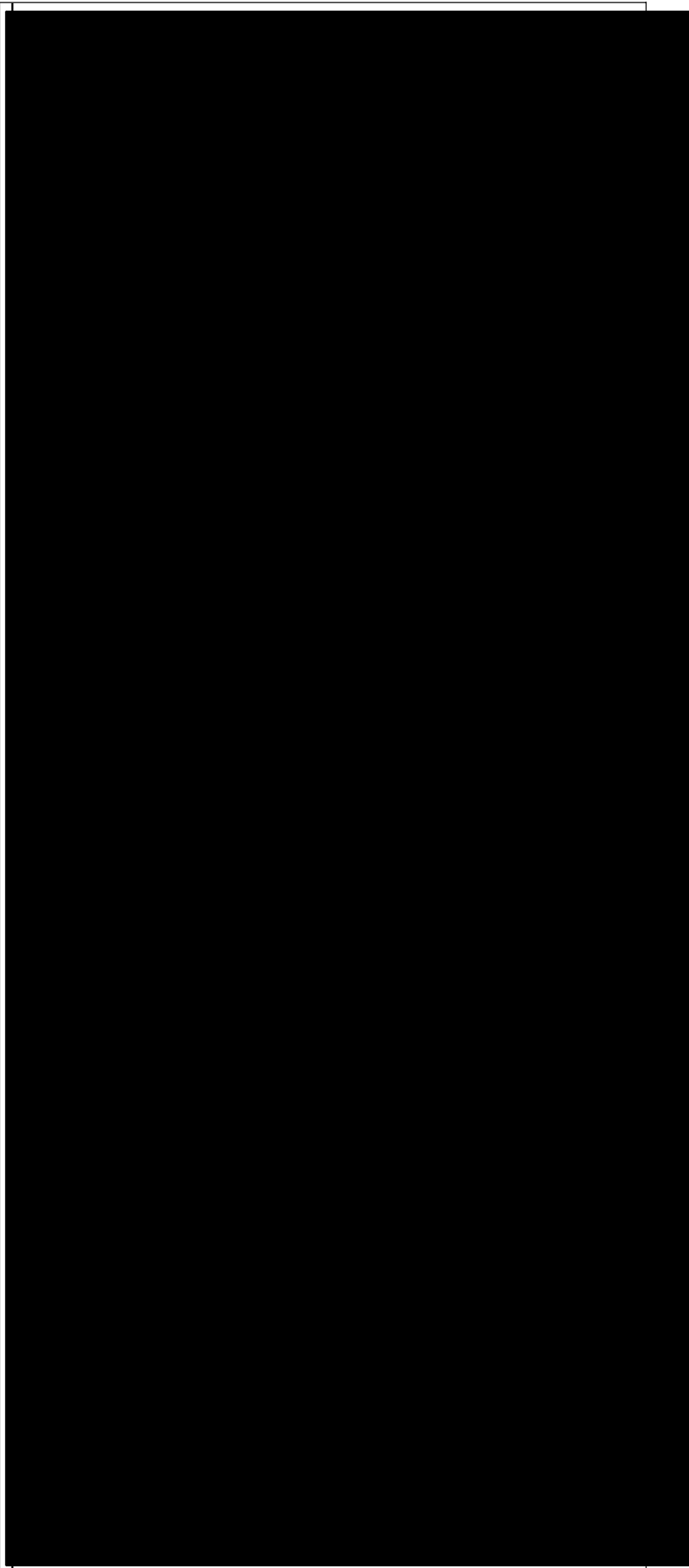
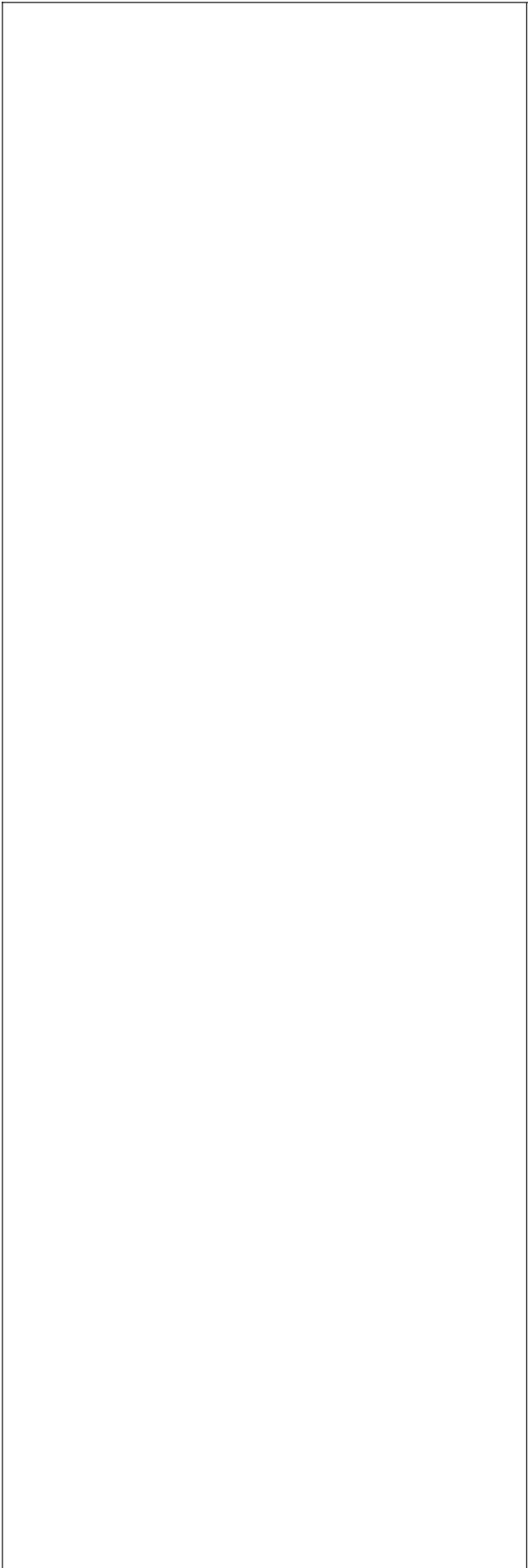
The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

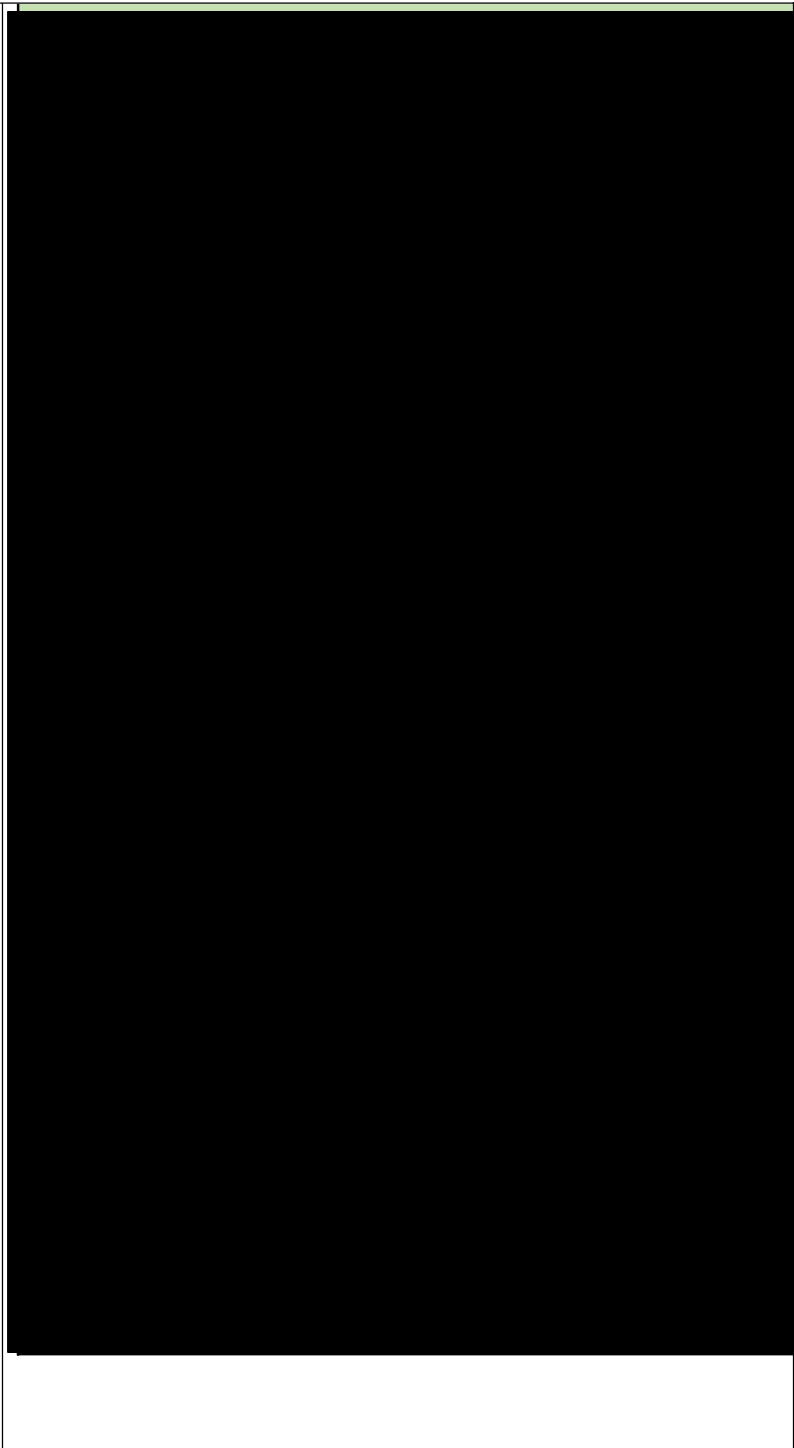
**REMITTER**

Bank Account Name:







	
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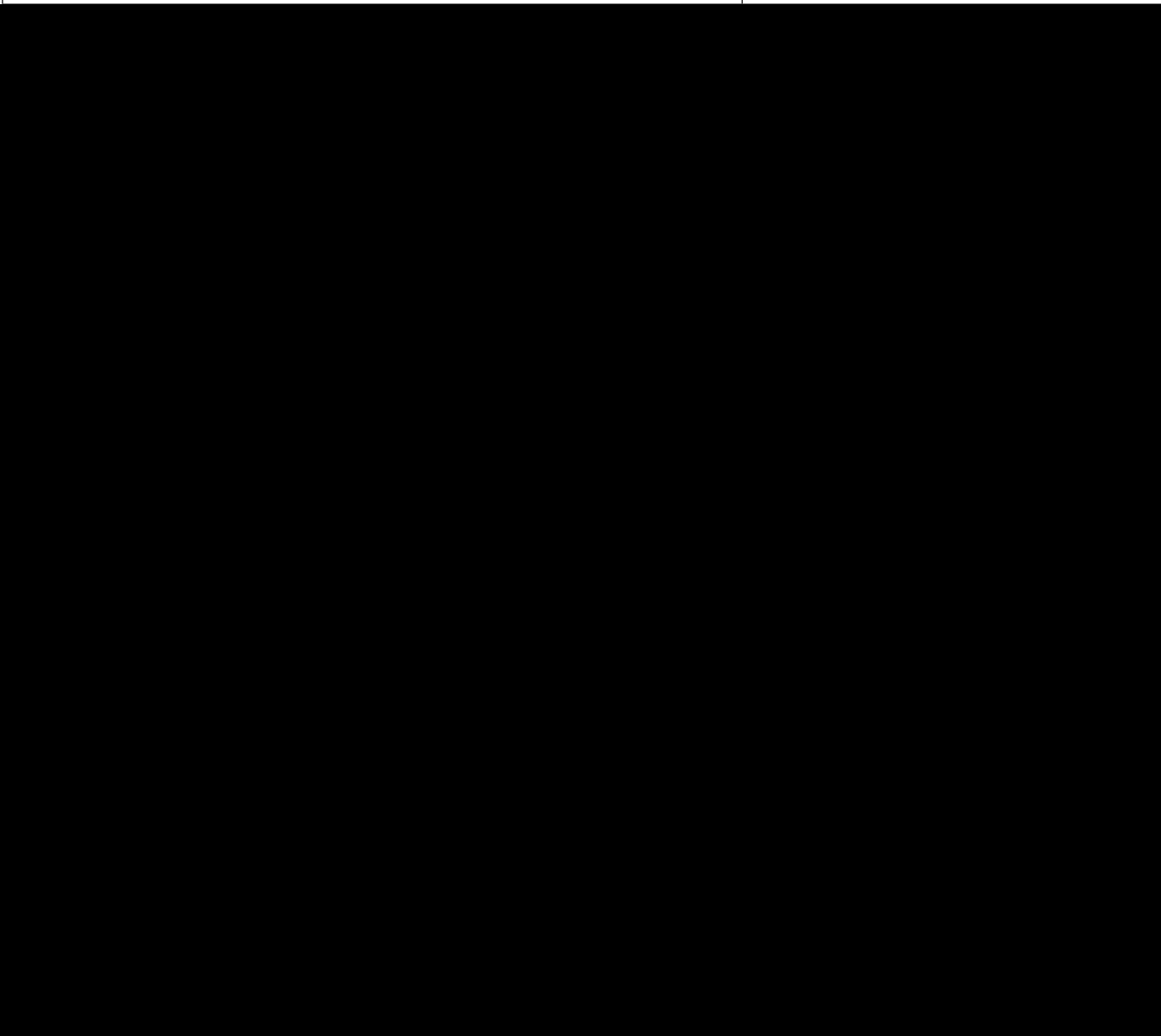
**SECTION 6 - FURTHER DETAILS**

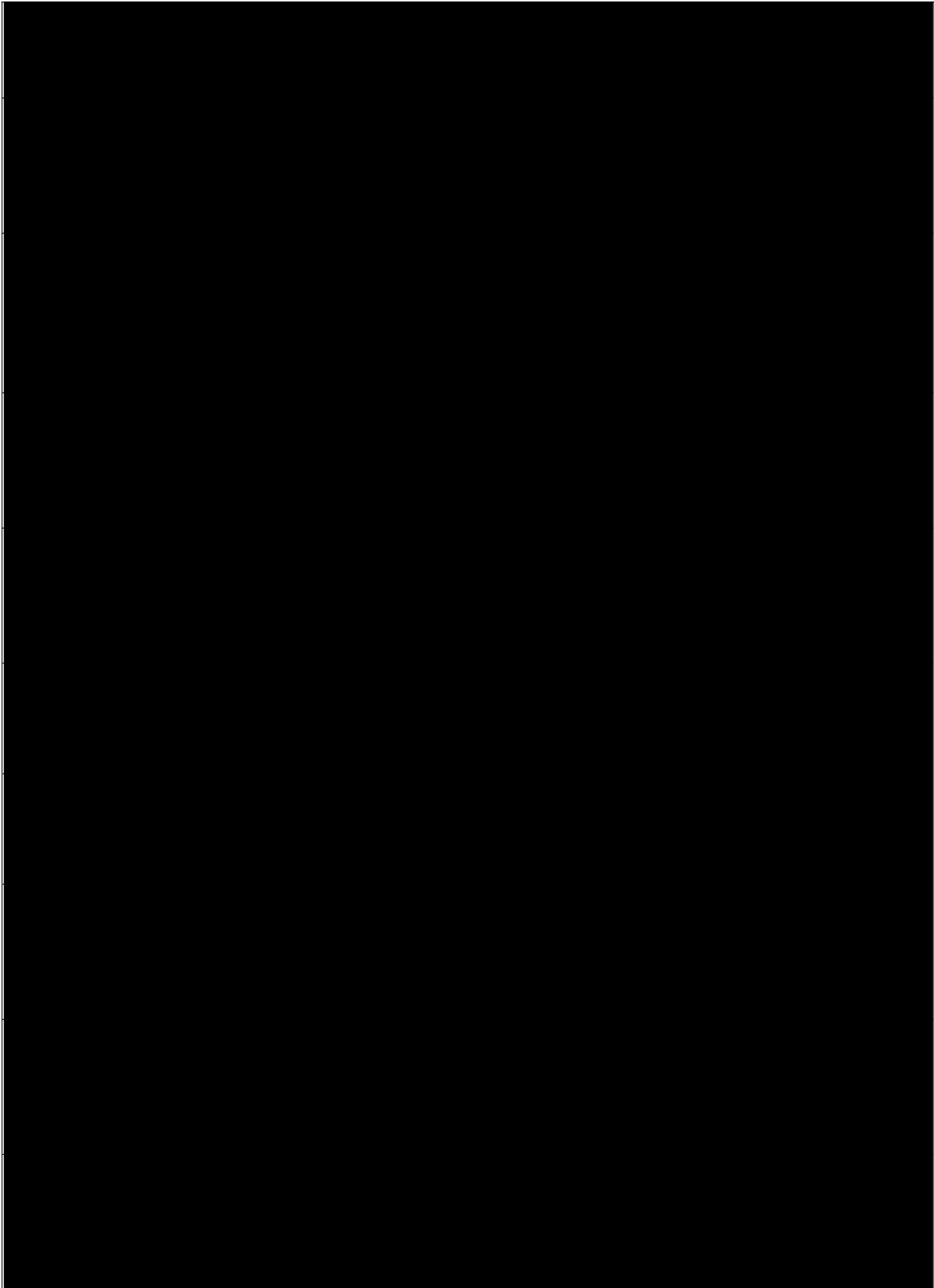
<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	
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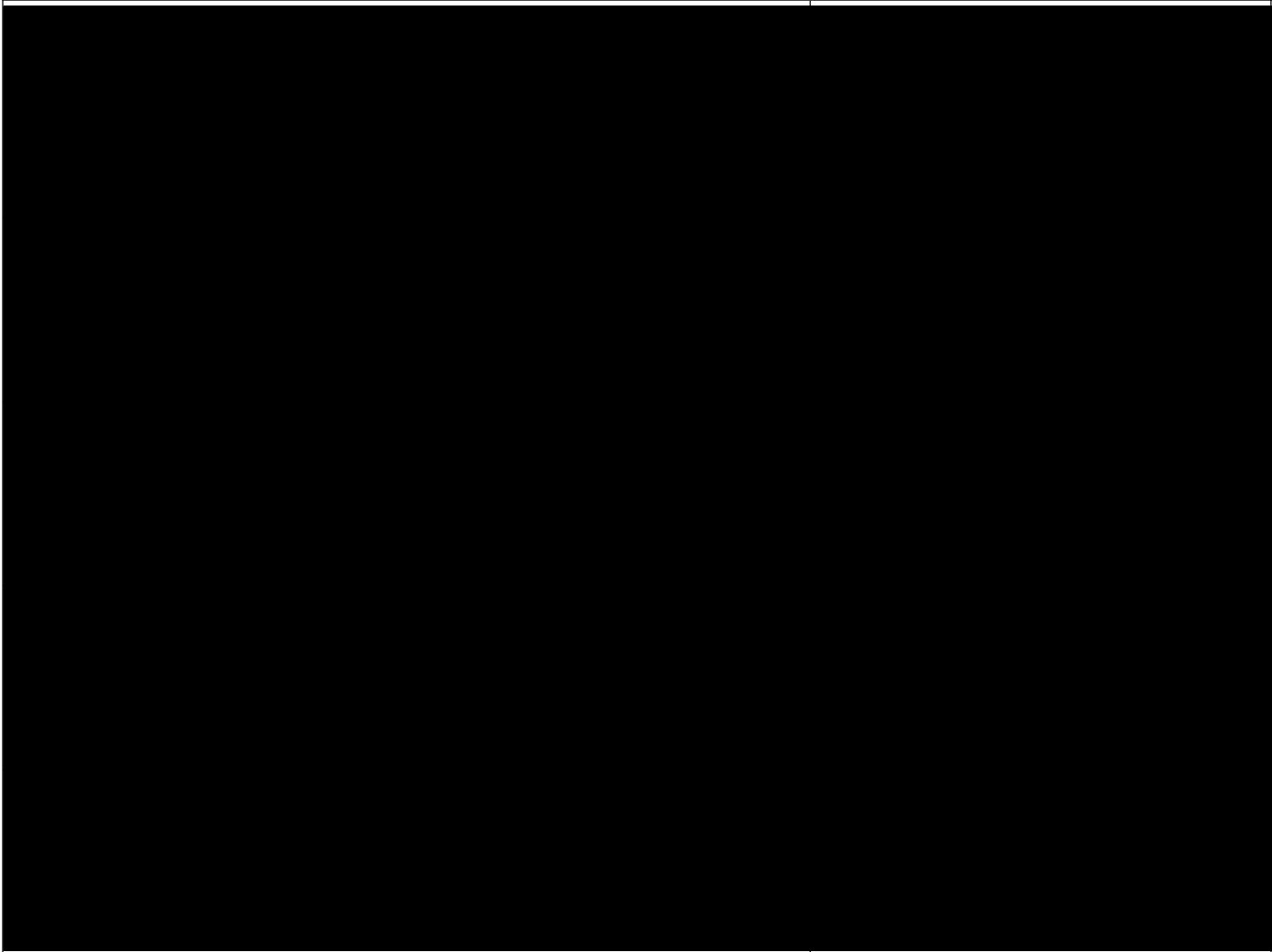
**SECTION 7 - DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
	







Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

## **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked “N/A”.

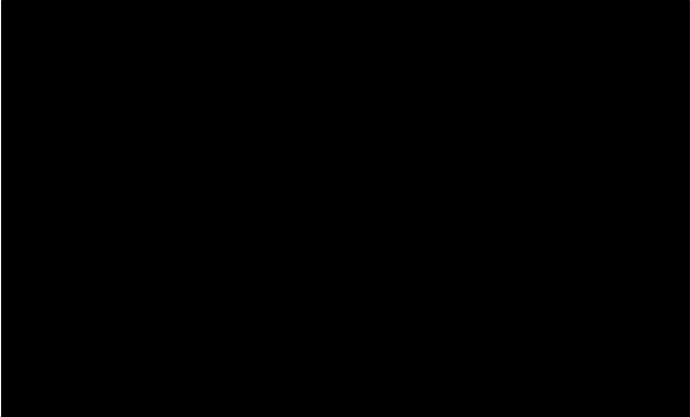
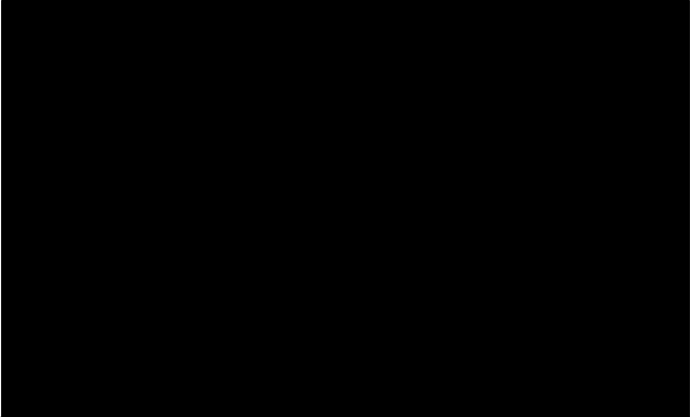
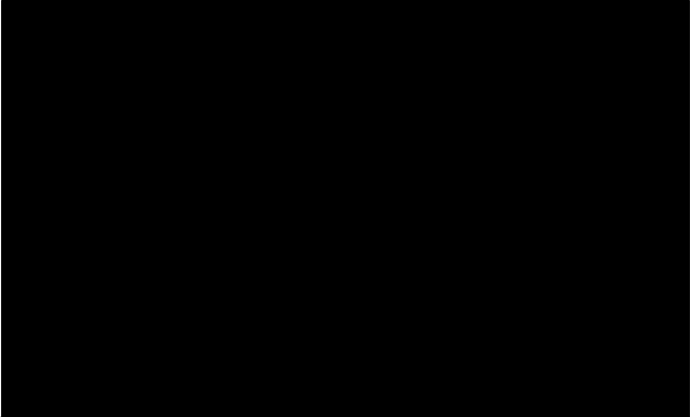
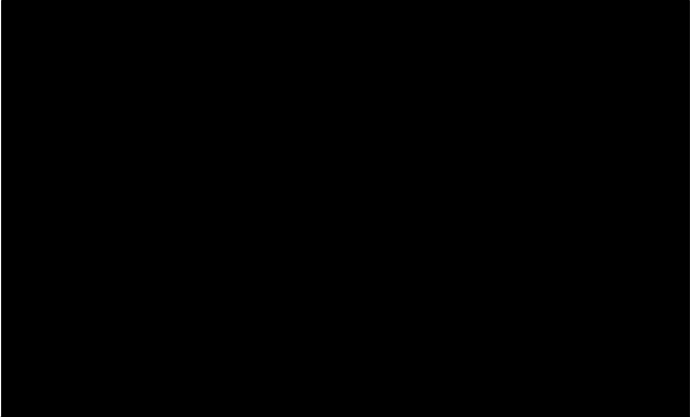
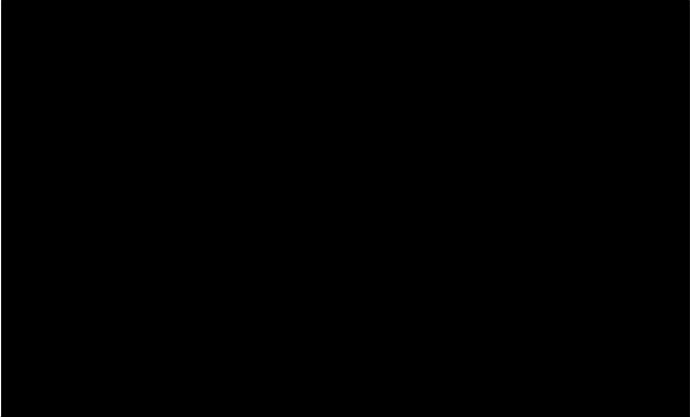
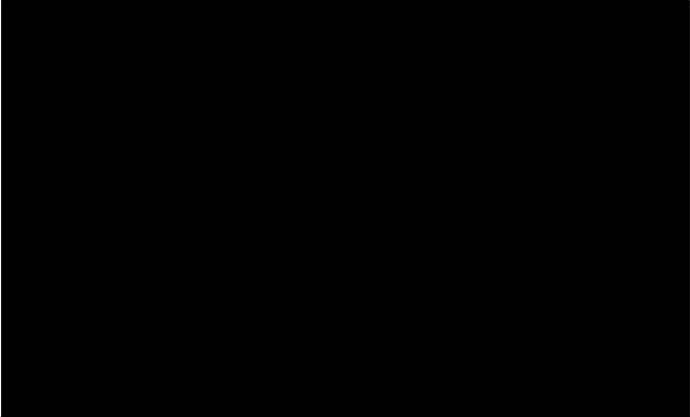
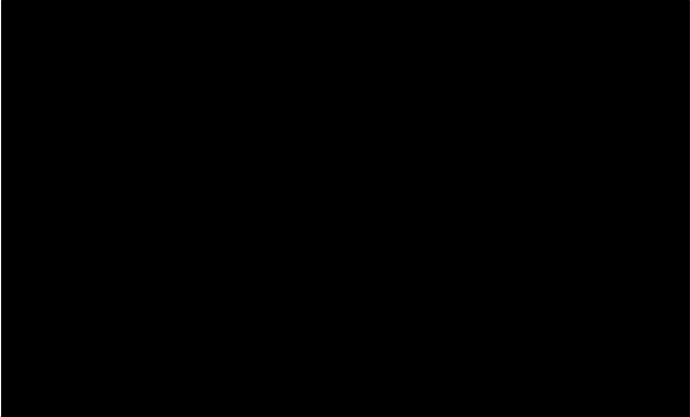
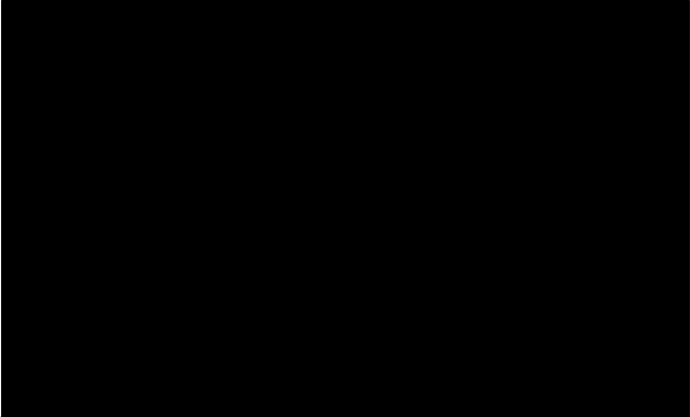
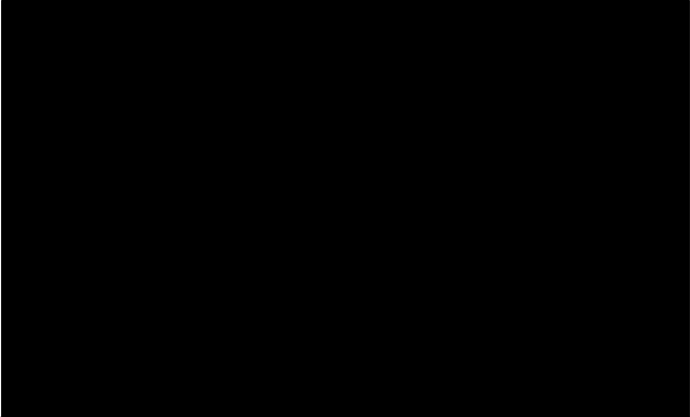
The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)



**SECTION 1 - UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</p>	<p>(1) Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(2) Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(3) Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p><b><u>Service providers (office day-to-day activities)</u></b></p> <ol style="list-style-type: none"> <li>1. </li> <li>2. </li> <li>3. </li> <li>4. </li> <li>5. </li> <li>6. </li> <li>7. </li> <li>8. </li> <li>9. </li> </ol>
<p>Date of application</p>	<p>28 April 2022</p>

**SECTION 2 - DETAILS OF THE APPLICANT(S)**

<p>Name of applicant(s)</p> <p>(include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe Designated Activity Company,</p> <p>a company incorporated and existing under the laws of Ireland (registered number 512927), having its registered office at 2 Hume Street, Dublin 2, Ireland.</p>
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Is the applicant a “designated person” <sup>1</sup> , or owned or controlled by a designated person? If so, please provide details	GTLK Europe DAC is 100% owned by GTLK JSC.
Describe the nature of the business performed by the applicant	Fully service international leasing platform for both Aircraft and Vessels.
Contact Name	[REDACTED]
Address	2 Hume street, Dublin 2, Ireland
Telephone number	[REDACTED]
Email address	[REDACTED]

### SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT

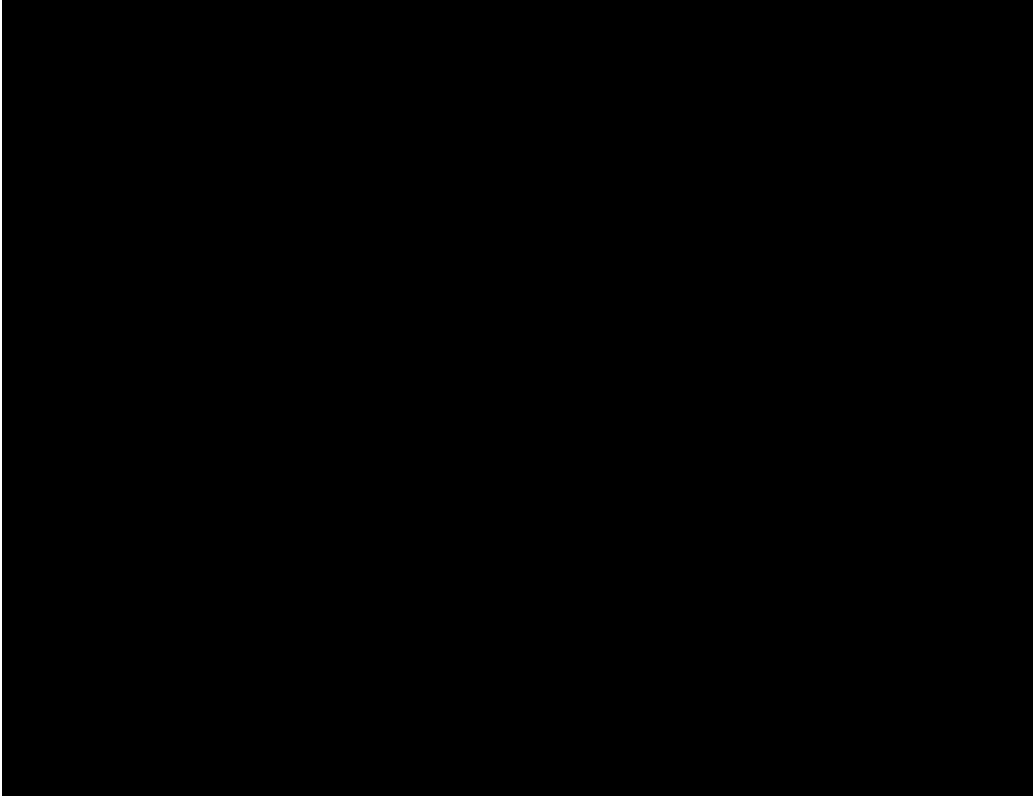
<p>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</li> <li>e) other</li> </ul> <p>In addition, please make clear if the derogation is required to cover one of</p>	<ul style="list-style-type: none"> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• Basic needs of the designated person</li> </ul>
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<sup>1</sup>“Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

<p>more of the following (non-exhaustive list):</p> <p>f) Basic needs of the designated person,</p> <p>g) Reasonable professional fees for the provision of financial services,</p> <p>h) other</p>	
<p>Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply ("designated person") and to whom the applicant has/had a relationship with</p>	GTLK JSC.
<p>Describe the nature of the relationship between the applicant and the designated person(s)</p>	GTLK Europe DAC is 100% owned by the Designated entity.
<p>Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided</p>	Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.

**SECTION 4 - DETAILS OF THE TRANSACTIONS(S) CONCERNED**

<b>Date of contract</b>	<ol style="list-style-type: none"> <li>1.</li> <li>2.</li> <li>3.</li> <li>4.</li> <li>5.</li> <li>6.</li> <li>7.</li> <li>8.</li> <li>9.</li> </ol>	
<b>Parties to the contract</b>	<ul style="list-style-type: none"> <li>• GTLK Europe DAC</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>	

<p>Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.</p>	<p>Yes, GTLK Europe DAC is 100% owned by JSC GTLK.</p>
<p>Date of the intended transaction(s).</p>	<ol style="list-style-type: none"><li>1.</li><li>2.</li><li>3.</li><li>4.</li><li>5.</li><li>6.</li><li>7.</li><li>8.</li><li>9.</li></ol> 

<p>Description of funds, economic resources or financial services to be supplied or obtained.</p>	<table border="1"> <thead> <tr> <th data-bbox="384 192 703 266">Service provider</th> <th data-bbox="703 192 914 266">Service type</th> <th data-bbox="914 192 1485 266">Description</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="384 266 1485 909" style="background-color: black;"> <!-- Redacted content --> </td> </tr> </tbody> </table>			Service provider	Service type	Description	Redacted content		
Service provider	Service type	Description							
Redacted content									
<p>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</p>	<p>No</p>								

<b>Value of the economic resources or financial services to be supplied or obtained (in EUR).</b>	<table border="1"> <thead> <tr> <th>Service provider</th> <th>Service type</th> <th>Service type</th> <th>Due date</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="background-color: black; height: 400px;">[Redacted Content]</td> </tr> </tbody> </table>					Service provider	Service type	Service type	Due date	Amount	[Redacted Content]				
	Service provider	Service type	Service type	Due date	Amount										
[Redacted Content]															
<b>Is the end user different from the contract customer?</b>	No														
<b>Is the end user owned or controlled by a designated person?</b>	No, GTLK Europe is only designated person														

Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?

No

Dates of any transactions or shipments already made.

2022 payments to the relevant service providers since start of the year:

	Date	Category	Beneficiary	Currency	Amount

<p>Dates of any future transactions or shipments.</p>	<div data-bbox="400 181 1493 412" style="background-color: black; width: 100%; height: 100%;"></div> <ul style="list-style-type: none"> <li data-bbox="400 421 1465 488">• [REDACTED]</li> <li data-bbox="400 539 1437 600">• [REDACTED]</li> </ul>
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**SECTION 5 - BANKING DETAILS**

<p>Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)</p>	<p>bank/electronic transfer</p>
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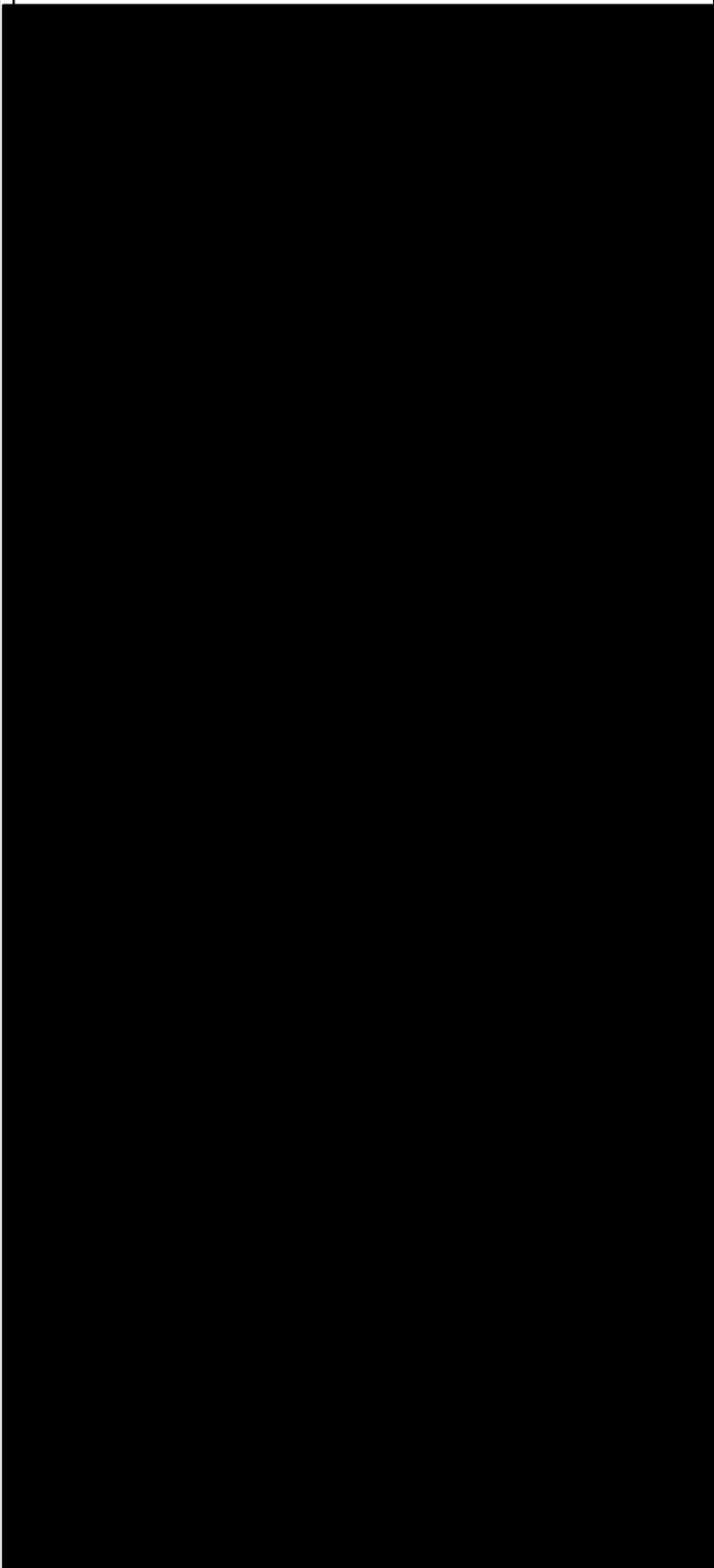


The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

**REMITTER**

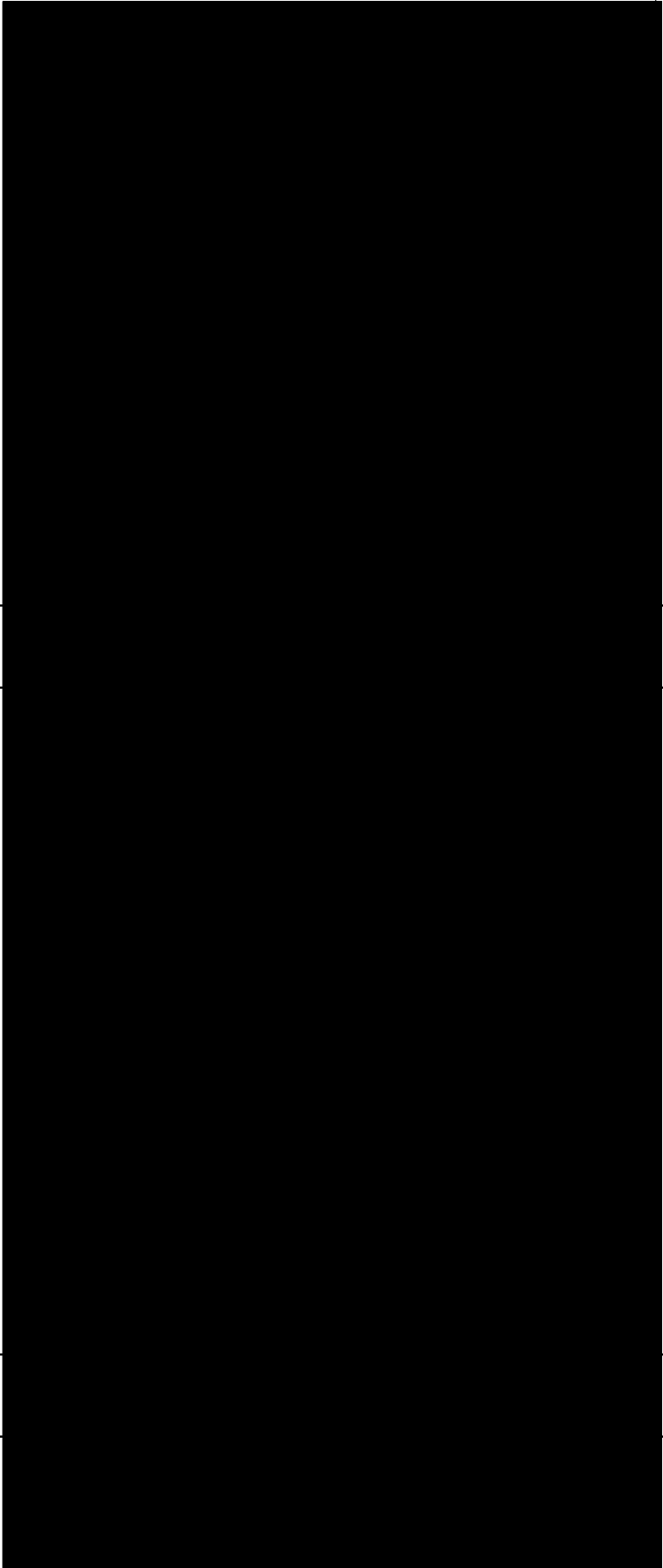
Bank Account Name:

GTLK EUROPE DESIGNATED ACTIVITY COMPANY



2, D

BENEFICIARY



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	SWIFT:  Intermediary Bank Name: n/a Intermediary Bank SWIFT: n/a
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**SECTION 6 - FURTHER DETAILS**

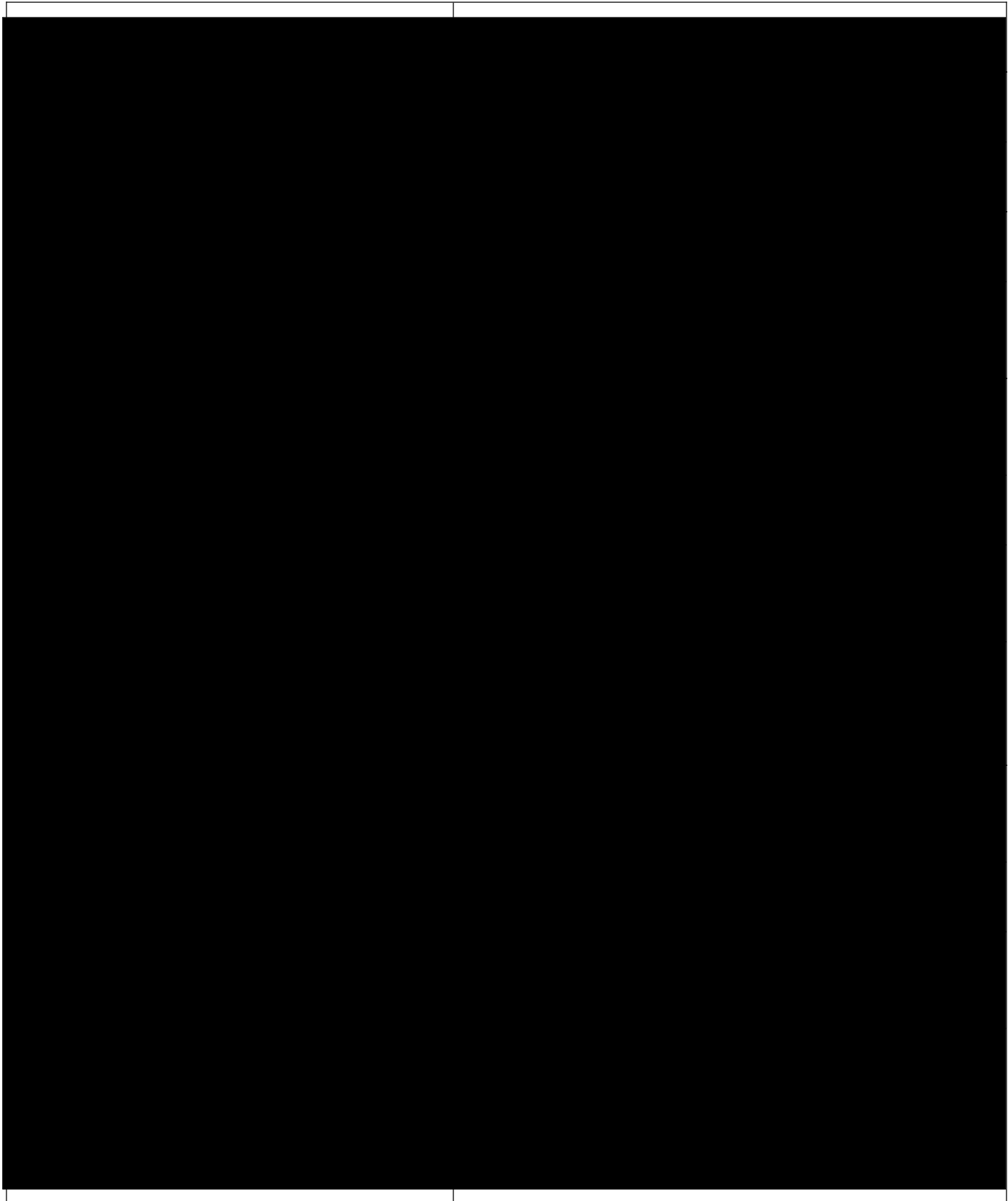
Provide any additional background information or explanation that would assist the Central Bank in considering this application	
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**SECTION 7 - DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
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- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application





Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

## **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked “N/A”.

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**SECTION 1 – UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</p>	<p>(1) Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(2) Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(3) Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p><b><u>Service providers (office day-to-day activities)</u></b></p> <p>1. [REDACTED]</p> <p>2. [REDACTED]</p> <p>3. [REDACTED]</p>
<p><b>Date of application</b></p>	<p>10 May 2022</p>

**SECTION 2 – DETAILS OF THE APPLICANT(S)**

<p>Name of applicant(s)</p> <p>(include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe Designated Activity Company,</p> <p>a company incorporated and existing under the laws of Ireland (registered number 512927), having its registered office at 2 Hume Street, Dublin 2, Ireland.</p>
<p>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</p>	<p>GTLK Europe DAC is 100% owned by GTLK JSC.</p>

<sup>1</sup> “Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).



Describe the nature of the business performed by the applicant	Fully service international leasing platform for both Aircraft and Vessels.
Contact Name	[REDACTED]
Address	2 Hume street, Dublin 2, Ireland
Telephone number	[REDACTED]
Email address	[REDACTED]

### SECTION 3 - DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT

<p>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</li> <li>e) other</li> </ul> <p>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</p> <ul style="list-style-type: none"> <li>f) Basic needs of the designated person,</li> <li>g) Reasonable professional fees for the provision of financial services,</li> <li>h) other</li> </ul>	<ul style="list-style-type: none"> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• Basic needs of the designated person</li> </ul>
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Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply ("designated person") and to whom the applicant has/had a relationship with	GTLK JSC.
Describe the nature of the relationship between the applicant and the designated person(s)	GTLK Europe DAC is 100% owned by the Designated entity.
Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided	Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.

**SECTION 4 - DETAILS OF THE TRANSACTIONS(S) CONCERNED**

Date of contract	<ol style="list-style-type: none"> <li>1. [REDACTED]</li> <li>2. [REDACTED]</li> <li>3. [REDACTED]</li> </ol>
Parties to the contract	<ul style="list-style-type: none"> <li>• GTLK Europe DAC</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul>
Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.	Yes, GTLK Europe DAC is 100% owned by JSC GTLK.
Date of the intended transaction(s).	<ol style="list-style-type: none"> <li>1. [REDACTED]</li> <li>2. [REDACTED]</li> <li>3. [REDACTED]</li> </ol>

<p>Description of funds, economic resources or financial services to be supplied or obtained.</p>	<table border="1"> <thead> <tr> <th data-bbox="400 190 707 241">Service provider</th> <th data-bbox="707 190 916 241">Service type</th> <th colspan="3" data-bbox="916 190 1485 241">Description</th> </tr> </thead> <tbody> <tr> <td colspan="5" data-bbox="400 241 1485 555" style="background-color: black;">[REDACTED]</td> </tr> </tbody> </table>					Service provider	Service type	Description			[REDACTED]				
Service provider	Service type	Description													
[REDACTED]															
<p>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</p>	<p>No</p>														
<p>Value of the economic resources or financial services to be supplied or obtained (in EUR).</p>	<table border="1"> <thead> <tr> <th data-bbox="400 1507 707 1581">Service provider</th> <th data-bbox="707 1507 896 1581">Service type</th> <th data-bbox="896 1507 1067 1581">Service type</th> <th data-bbox="1067 1507 1257 1581">Due date</th> <th data-bbox="1257 1507 1485 1581">Amount</th> </tr> </thead> <tbody> <tr> <td colspan="5" data-bbox="400 1581 1485 1850" style="background-color: black;">[REDACTED]</td> </tr> </tbody> </table>					Service provider	Service type	Service type	Due date	Amount	[REDACTED]				
Service provider	Service type	Service type	Due date	Amount											
[REDACTED]															

<p>Is the end user different from the contract customer?</p>	<p>No</p>										
<p>Is the end user owned or controlled by a designated person?</p>	<p>No, GTLK Europe is only designated person</p>										
<p>Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?</p>	<p>No</p>										
<p>Dates of any transactions or shipments already made.</p>	<p>Previous (2021- 2022) payments to the relevant service providers:</p> <table border="1" data-bbox="400 1305 1275 1597"> <thead> <tr> <th data-bbox="400 1305 536 1346">Date</th> <th data-bbox="536 1305 687 1346">Category</th> <th data-bbox="687 1305 975 1346">Beneficiary</th> <th data-bbox="975 1305 1102 1346">Currency</th> <th data-bbox="1102 1305 1275 1346">Amount</th> </tr> </thead> <tbody> <tr> <td colspan="5" data-bbox="400 1346 1275 1597" style="background-color: black;">[REDACTED]</td> </tr> </tbody> </table>	Date	Category	Beneficiary	Currency	Amount	[REDACTED]				
Date	Category	Beneficiary	Currency	Amount							
[REDACTED]											

Dates of any future transactions or shipments.

Service provider	Description	Service type	Due date	Amount	Service period
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[Redacted]					
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- [Redacted]

**SECTION 5 - BANKING DETAILS**

Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)	bank/electronic transfer
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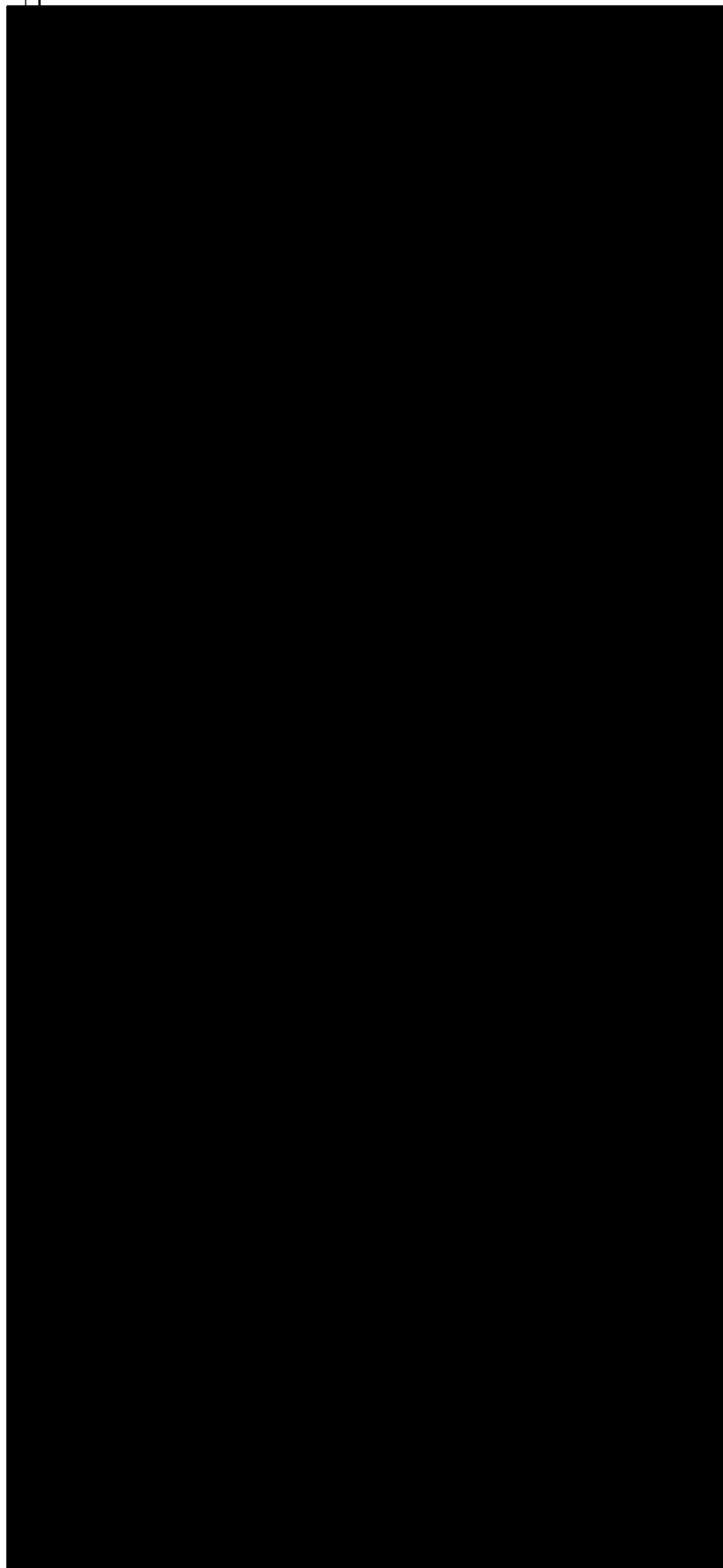
—

The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

**REMITTER**

Bank Account Name:

GTLK EUROPE DESIGNATED ACTIVITY COMPANY




	Intermediary Bank Name: n/a Intermediary Bank SWIFT: n/a
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**SECTION 6 - FURTHER DETAILS**

Provide any additional background information or explanation that would assist the Central Bank in considering this application	
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**SECTION 7 - DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application







Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

**Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

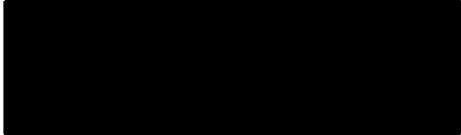

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked “N/A”.

The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)

**SECTION 1 – UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p><b>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</b></p>	<p>(1) Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(2) Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p> <p>(3) Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p><b><u>Service providers (office day-to-day activities)</u></b></p> <p>1. </p>
<p><b>Date of application</b></p>	<p> May 2022</p>

**SECTION 2 – DETAILS OF THE APPLICANT(S)**

<p><b>Name of applicant(s)</b>  (include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe Designated Activity Company,  a company incorporated and existing under the laws of Ireland (registered number 512927), having its registered office at 2 Hume Street, Dublin 2, Ireland.</p>
<p><b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b></p>	<p>GTLK Europe DAC is 100% owned by GTLK JSC.</p>

<sup>1</sup> “Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

<b>Describe the nature of the business performed by the applicant</b>	Fully service international leasing platform for both Aircraft and Vessels.
<b>Contact Name</b>	[REDACTED]
<b>Address</b>	2 Hume street, Dublin 2, Ireland
<b>Telephone number</b>	[REDACTED]
<b>Email address</b>	[REDACTED]

**SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT**

<p><b>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</b></p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</li> <li>e) other</li> </ul> <p>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</p> <ul style="list-style-type: none"> <li>f) Basic needs of the designated person,</li> <li>g) Reasonable professional fees for the provision of financial services,</li> <li>h) other</li> </ul>	<ul style="list-style-type: none"> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• Basic needs of the designated person</li> </ul>
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Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply (“designated person”) and to whom the applicant has/had a relationship with	GTLK JSC.
Describe the nature of the relationship between the applicant and the designated person(s)	GTLK Europe DAC is 100% owned by the Designated entity.
Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided	Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.

**SECTION 4 – DETAILS OF THE TRANSACTIONS(S) CONCERNED**

Date of contract	<ul style="list-style-type: none"> <li>• [REDACTED]</li> </ul>						
Parties to the contract	<ul style="list-style-type: none"> <li>• GTLK Europe DAC</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul>						
Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.	Yes, GTLK Europe DAC is 100% owned by JSC GTLK.						
Date of the intended transaction(s).	1. [REDACTED] [REDACTED]						
Description of funds, economic resources or financial services to be supplied or obtained.	<table border="1"> <thead> <tr> <th>Service provider</th> <th>Service type</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>[REDACTED]</td> <td>[REDACTED]</td> <td>[REDACTED]</td> </tr> </tbody> </table>	Service provider	Service type	Description	[REDACTED]	[REDACTED]	[REDACTED]
	Service provider	Service type	Description				
[REDACTED]	[REDACTED]	[REDACTED]					

<p><b>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</b></p>	<p>No</p>														
<p><b>Value of the economic resources or financial services to be supplied or obtained (in EUR).</b></p>	<table border="1"> <thead> <tr> <th data-bbox="395 925 703 994">Service provider</th> <th data-bbox="708 925 895 994">Service type</th> <th data-bbox="900 925 1066 994">Service type</th> <th data-bbox="1070 925 1254 994">Due date</th> <th data-bbox="1259 925 1485 994">Amount</th> </tr> </thead> <tbody> <tr> <td data-bbox="395 1001 703 1070">██████████</td> <td data-bbox="708 1001 895 1070">██████████</td> <td data-bbox="900 1001 1066 1070">██████████</td> <td data-bbox="1070 1001 1254 1070">██████████</td> <td data-bbox="1259 1001 1485 1070">██████████</td> </tr> </tbody> </table>					Service provider	Service type	Service type	Due date	Amount	██████████	██████████	██████████	██████████	██████████
Service provider	Service type	Service type	Due date	Amount											
██████████	██████████	██████████	██████████	██████████											
<p><b>Is the end user different from the contract customer?</b></p>	<p>No</p>														
<p><b>Is the end user owned or controlled by a designated person?</b></p>	<p>No, GTLK Europe is only designated person</p>														







	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 85%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 40%; height: 15px; margin-bottom: 5px;"></div> <p>Intermediary Bank Name: n/a</p> <p>Intermediary Bank SWIFT: n/a</p>
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**SECTION 6 – FURTHER DETAILS**

<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	
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**SECTION 7 – DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
1. <div style="background-color: black; width: 100%; height: 15px;"></div>	<div style="background-color: black; width: 60%; height: 15px;"></div>
2. <div style="background-color: black; width: 100%; height: 15px;"></div>	<div style="background-color: black; width: 80%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 90%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 70%; height: 15px;"></div>

	<div style="background-color: black; width: 100%; height: 100%;"></div>
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Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

T +353 (0)1 224 6000

Bosca PO 559  
Baile Átha Cliath 1

PO Box 559  
Dublin 1

[www.centralbank.ie](http://www.centralbank.ie)

## Record 8

[REDACTED]  
GTLK Europe DAC  
2 Hume Street  
Dublin 2

16 May 2022

**Re: GTLK Europe DAC**  
**Authorisation request under Council Regulation (EU) No 269/2014 (the “Regulation”) to**  
**make salary and associated payroll payments**  
**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to make salary payments to its employees, as well as associated payroll payments, including tax, health insurance, pension and income protection insurance.

### **Requirement for an authorisation**

It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.<sup>1</sup>

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<sup>1</sup> See EU Commission Best Practices for the effective implementation of restrictive measures:  
<https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf>



Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, salaries of its employees.

### **Assessment criteria set out in the Regulation**

Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) the funds or economic resources shall be used for a payment by a designated person; and
- b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person before the date on which it was listed as a designated person, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.

### **Decision**

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application for authorisation, including but not



limited to the Sanctions Derogation Application Form, dated 11 April 2022, and supporting documentation, including *inter alia*, the list of net salary and associated payroll payment amounts due for April, May and June 2022, the bank account details of the employees, and beneficiaries of associated payments and employment contracts.

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from three bank accounts in the name of GTLK Europe DAC as set out at Appendix III, in respect of the following:

- (i) Salary payments to the [REDACTED] employees of GTLK Europe DAC, subject to the maximum amounts, listed in Appendix I to this letter. This authorisation covers salary payments to the employees and bank accounts listed in Appendix I for April, May and June 2022; and
- (ii) Associated payroll payments to the beneficiaries of GTLK Europe DAC, subject to the maximum amounts listed in Appendix II to this letter. This authorisation covers associated payroll payments to the beneficiaries and bank accounts listed in Appendix II for April, May and June 2022.

This authorisation is subject to the following conditions:

- i. GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;
- ii. GTLK Europe DAC warrants that that the natural or legal persons that will receive any payments under this authorisation are not designated persons;
- iii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU Sanction regime;
- iv. GTLK Europe DAC must not request an authorisation under the Regulation to make salary payments to its employees from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

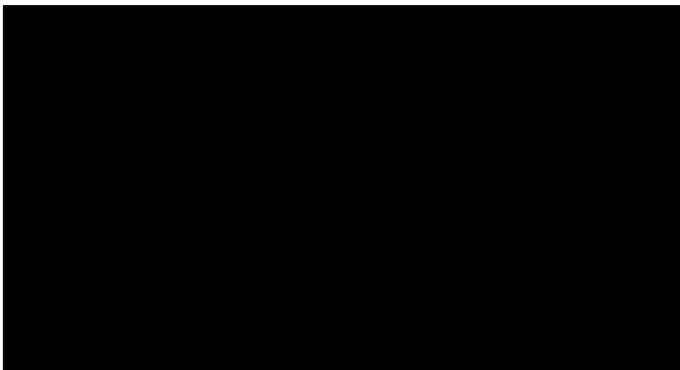
This authorisation is not transferable and GTLK Europe DAC remains at all times responsible for ensuring that it complies with all EU Sanctions Regimes.



This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the salary and associated payments on behalf of GTLK under any EU Sanctions Regime, AML/CFT legislation, or any other applicable legislation. All third parties remain at all times responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**





Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem







Appendix II – Associated Payroll Payments

No.	Recipient name	Recipient Bank name	Recipient IBAN	Paying account IBAN	Maximum Amount (EUR)		
					April 2022	May 2022	June 2022
█							
█							
█							



Appendix III: Applicant bank accounts from which salary and associated payments will be made

Bank	IBAN	Currency	Current balance
[Redacted content]			



[REDACTED]

[REDACTED]

GTLK Europe DAC  
2 Hume Street  
Dublin 2

Record 9

25 May 2022

**Re: GTLK Europe DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (the “Regulation”) to make office rent and service charge payments in respect of the rented office premises at 2<sup>nd</sup> Floor, 2 Hume Street, Dublin 2**

**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to make its office rent and service charge payments in respect of the rented office premises at 2<sup>nd</sup> Floor, 2 Hume Street, Dublin 2 (the “**Premises**”).

#### **Requirement for an authorisation**

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “designated person”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.



It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.<sup>1</sup>

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, payment of its office rent and service charges in respect of the Premises, to [REDACTED] as managing agent of the landlord of the Premises, [REDACTED] the “Landlord”).

#### **Assessment criteria set out in the Regulation**

Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) the funds or economic resources shall be used for a payment by a designated person;  
and
- b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person

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<sup>1</sup> See EU Commission Best Practices for the effective implementation of restrictive measures:  
<https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf>



before the date on which it was listed as a designated person, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.

## Decision

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application for authorisation, including but not limited to the Sanctions Derogation Application Form dated 11 April 2022, the Sanctions Derogation Application Form dated [REDACTED] May 2022 and supporting documentation, including *inter alia*, [REDACTED]  
[REDACTED]  
[REDACTED] and information regarding the beneficial owners of both [REDACTED] and the Landlord provided by GTLK Europe DAC .

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from either bank account in the name of GTLK Europe DAC as set out in Appendix II, in respect of the following:

- (i) Office rent and service charge payments to [REDACTED] as managing agent for the Landlord, subject to the maximum amounts listed in Appendix I to this letter. This authorisation covers office rent and service charge payments in respect of the Premises to [REDACTED] bank account, listed in Appendix I, for the periods [REDACTED]  
[REDACTED]

This authorisation is subject to the following conditions:

- i. GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;
- ii. GTLK Europe DAC warrants that the natural or legal persons that will receive any payments under this authorisation are not designated persons;



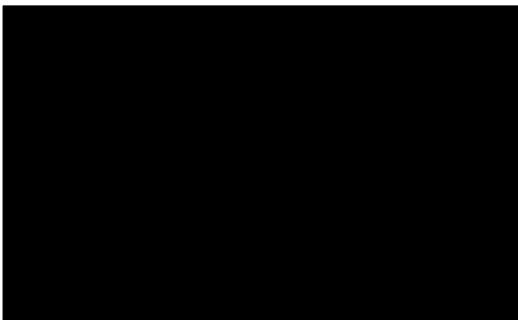
- iii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU Sanction regime;
- iv. GTLK Europe DAC must not request an authorisation under the Regulation to make office rent and service charge payments to [REDACTED] as agent for the landlord [REDACTED] from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

This authorisation is not transferable. GTLK Europe DAC remains at all times responsible for ensuring that it complies with its financial sanctions obligations.

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the rent and service charge payments on behalf of GTLK Europe DAC under any EU Sanctions Regime, AML/CFT legislation, or any other applicable legislation. All third parties remain at all times responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

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Baile Átha Cliath 1

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Dublin 1

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**Appendix I – Rent and service charge payments to** [REDACTED]

No.	Rental period	Recipient Bank name	Recipient IBAN	Paying account IBAN	Maximum Amount (EUR)
[REDACTED]					



**Appendix II: Applicant bank accounts from which office rent and service charge payments in respect of the Premises will be made**

It is intended that the office rental and associated service charge payments [REDACTED] [REDACTED] will be made from either of the following bank accounts of the Applicant:

Bank	IBAN	Currency	Current balance
[REDACTED]			





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Eurosystem

### **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked “N/A”.

The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)

**SECTION 1 – UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p><b>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</b></p>	<p><b>Council Regulation (EU) No 269/2014</b></p> <p>Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “designated person”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:</p> <ul style="list-style-type: none"><li>a) the funds or economic resources shall be used for a payment by a designated person; and</li><li>b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.</li></ul> <p>Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person before the date on which it was listed as a designated person, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.</p>
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	<p>EU Trade FAQs – Dated 4<sup>th</sup> May 2020</p> <p>20. Can the Russian State pay coupons on its Eurobonds? Last update: 4 May 2022 EU sanctions do not impose any impediments to receive income payments, dividend payments or principal repayments of existing securities from Russian issuers. The restrictive measures imposed by the EU in Council Regulation (EU) No 833/2014 in relation to purchases of the securities issued by the Russian State, certain banks and corporations apply to purchases of securities issued after a certain date (i.e. 9 March 2022 for securities issued by the Russian State or the Russian Central bank).</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p>[REDACTED]</p>
<p><b>Date of application</b></p>	<p>25 May 2022</p>

## SECTION 2 – DETAILS OF THE APPLICANT(S)

<p><b>Name of applicant(s)</b> (include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe Designated Activity Company, a company incorporated and existing under the laws of Ireland (registered number 512927), having its registered office at 2 Hume Street, Dublin 2, Ireland.</p>
<p><b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b></p>	<p>GTLK Europe DAC is 100% owned by JSC GTLK</p>
<p><b>Describe the nature of the business performed by the applicant</b></p>	<p>Fully service international leasing platform for both Aircraft and Vessels.</p>
<p><b>Contact Name</b></p>	<p>[REDACTED]</p>
<p><b>Address</b></p>	<p>2nd Floor, 2 Hume Street, Dublin 2</p>
<p><b>Telephone number</b></p>	<p>[REDACTED]</p>
<p><b>Email address</b></p>	<p>[REDACTED]</p>

## SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT

<sup>1</sup> “Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

**Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:**

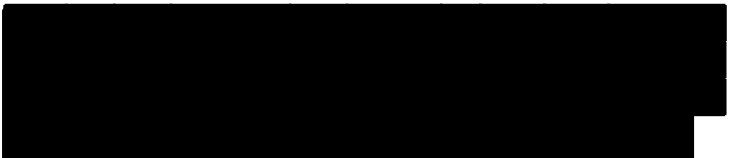
- a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,
- b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,
- c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,
- d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,
- e) other

**In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):**

- f) Basic needs of the designated person,
- g) Reasonable professional fees for the provision of financial services,
- h) other



The derogation request relates to the basic needs of the designated person (GTLK Europe DAC) to meet its obligations to the holders of the Eurobond notes.



**Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply ("designated person") and to whom the applicant has/had a relationship with**

GTLK JSC was listed in Annex I to the Regulation on 8 April 2022 by Council Implementation Regulation (EU) 2022/581.

**Describe the nature of the relationship between the applicant and the designated person(s)**


GTLK Europe DAC is 100% owned by the Designated entity.

**Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided**

Fully service international leasing platform for both Aircraft and Vessels.

**SECTION 4 – DETAILS OF THE TRANSACTIONS(S) CONCERNED**

<p><b>Date of contract</b></p>	<p>31/05/2017</p>
<p><b>Parties to the contract</b></p>	<p>- GTLK Europe DAC                  - [REDACTED]                  - Holders of the Eurobond notes</p>
<p><b>Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.</b></p>	<p>GTLK Europe DAC is 100% owned by JSC GTLK</p>
<p><b>Date of the intended transaction(s).</b></p>	<p>[REDACTED]</p>
<p><b>Description of funds, economic resources or financial services to be supplied or obtained.</b></p>	<p>[REDACTED]</p>

<p><b>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</b></p>	<p>No.</p>
<p><b>Value of the economic resources or financial services to be supplied or obtained (in EUR).</b></p>	
<p><b>Is the end user different from the contract customer?</b></p>	<p>The end users of the funds are the holders of the Eurobond notes.</p>
<p><b>Is the end user owned or controlled by a designated person?</b></p>	<p>No.</p>

Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?

No.

Dates of any transactions or shipments already made.	Date	Payment, US\$	Description
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████


Dates of any future transactions or shipments.	Date	Payment, US\$	Description
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████
	██████████	██████████	██████████

**SECTION 5 – BANKING DETAILS**





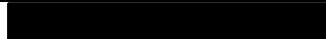
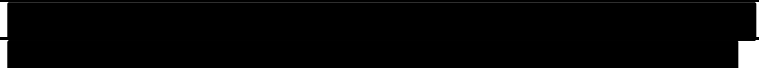










**SECTION 6 – FURTHER DETAILS**

<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	
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**SECTION 7 – DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
	
	
	
	
	
	



## Record 11

[REDACTED]  
GTLK Europe DAC

2 Hume Street

Dublin 2

25 May 2022

**Re: GTLK Europe DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 (the “Regulation”) to make salary and associated payroll payments**

**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to make salary payments to its employees, as well as associated payroll payments, including tax, health insurance, pension and income protection insurance.

We note that GTLK Europe DAC has requested that certain amendments be made to the authorisation granted by the Central Bank on 16 May 2022 in respect of salary and related payments. These amendments relate to the sums set out in Appendix 1, and to the bank accounts details set out in Appendix 3. Accordingly this authorisation has included the amended figures and references in Appendix 1 and 3 hereto, and revokes and replaces the prior authorisation granted on 16 May 2022 (attached).



## Requirement for an authorisation

It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.<sup>1</sup>

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, salaries of its employees.

## Assessment criteria set out in the Regulation

Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) the funds or economic resources shall be used for a payment by a designated person; and

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<sup>1</sup> See EU Commission Best Practices for the effective implementation of restrictive measures:  
<https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf>



- b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person before the date on which it was listed as a designated person, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.

### Decision

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application for authorisation, including but not limited to the Sanctions Derogation Application Form, dated 11 April 2022, and supporting documentation, including *inter alia*, the list of net salary and associated payroll payment amounts due for April, May and June 2022, the bank account details of the employees, and beneficiaries of associated payments and employment contracts.

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from three bank accounts in the name of GTLK Europe DAC as set out at Appendix III, in respect of the following:

- (i) Salary payments to the [REDACTED] employees of GTLK Europe DAC, subject to the maximum amounts, listed in Appendix I to this letter. This authorisation covers salary payments to the employees and bank accounts listed in Appendix I for April, May and June 2022; and
- (ii) Associated payroll payments to the beneficiaries of GTLK Europe DAC, subject to the maximum amounts listed in Appendix II to this letter. This authorisation covers associated payroll payments to the beneficiaries and bank accounts listed in Appendix II for April, May and June 2022.

The figures listed in Appendix 1 may be increased up to a maximum of 10% if necessary due to fluctuations in tax treatment of amounts payable under a listed employee's contract of employment.



This authorisation is subject to the following conditions:

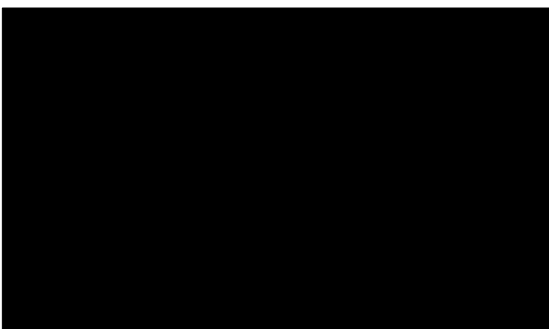
- i. GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;
- ii. GTLK Europe DAC warrants that the natural or legal persons that will receive any payments under this authorisation are not designated persons;
- iii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU Sanction regime;
- iv. GTLK Europe DAC must not request an authorisation under the Regulation to make salary payments to its employees from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

This authorisation is not transferable and GTLK Europe DAC remains at all times responsible for ensuring that it complies with all EU Sanctions Regimes.

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the salary and associated payments on behalf of GTLK under any EU Sanctions Regime, AML/CFT legislation, or any other applicable legislation. All third parties remain at all times responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



T +353 (0)1 224 6000

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Dublin 1

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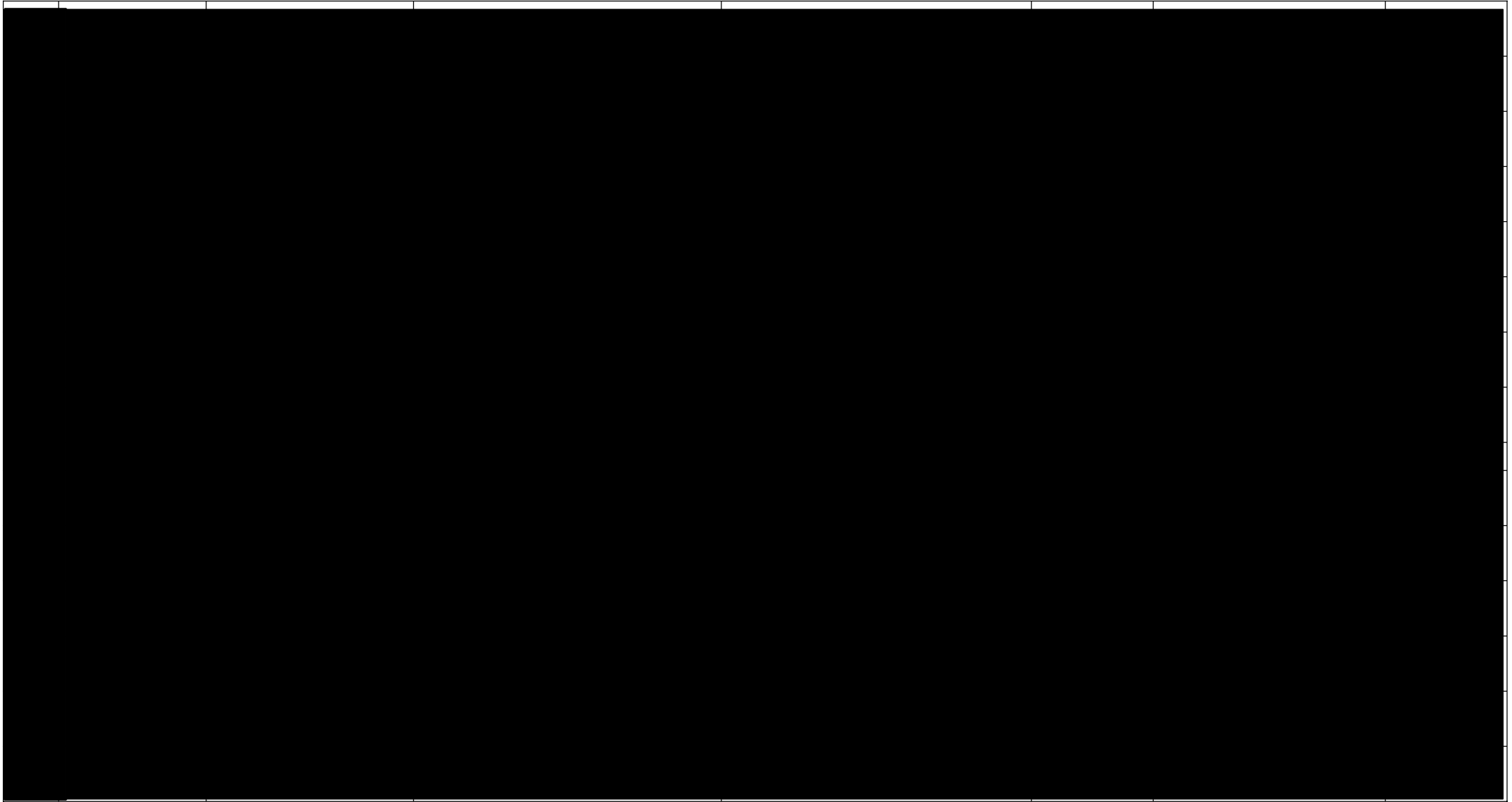
**Appendix I - Employee Salaries**

No.	Employee name	Recipient Bank name	Recipient IBAN	Paying account IBAN	Maximum Amount (EUR) (plus 10% if required for tax purposes)		
					April 2022	May 2022	June 2022
[Redacted content]							



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**Appendix II – Associated Payroll Payments**

No.	Recipient name	Recipient Bank name	Recipient IBAN	Paying account IBAN	Maximum Amount (EUR)		
					April 2022	May 2022	June 2022
1							
2							
3							
4							



Appendix III: Applicant bank accounts from which salary and associated payments will be made

Bank	IBAN	Currency	Current balance
[Redacted content]			



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### **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked "N/A".

■ Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

■ Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)

**SECTION 1 – UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p><b>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</b></p>	<ul style="list-style-type: none"> <li>(1) Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</li> <li>(2) Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</li> <li>(3) Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine</li> </ul>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div>
<p><b>Date of application</b></p>	<p>26/05/22</p>

**SECTION 2 – DETAILS OF THE APPLICANT(S)**

<b>Name of applicant(s)</b> (include individual name and/or company name, together with registration number and any other identifying information)	GTLK Europe DAC, No 2, Hume street, Dublin 2, Ireland  – company number 512927
<b>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</b>	GTLK Europe DAC is 100% owned by JSC GTLK
<b>Describe the nature of the business performed by the applicant</b>	Fully service international leasing platform for both Aircraft and Vessels.
<b>Contact Name</b>	[REDACTED]
<b>Address</b>	Hume street, Dublin 2, Ireland
<b>Telephone number</b>	+ [REDACTED]
<b>Email address</b>	[REDACTED]@gtlkeurope.com

**SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT**

<p><b>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</b></p> <ul style="list-style-type: none"> <li>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</li> <li>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</li> <li>c) To enable the provision of financial services, directly or indirectly, to or for the benefit of a designated person,</li> <li>d) To enable the receipt of financial services, directly or</li> </ul>	<p>To release frozen funds or economic resources, or make them available, directly, or indirectly, to or for the benefit of a designated person:</p> <p>[REDACTED]</p>
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<sup>1</sup> “Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

<p>indirectly, from a designated person to or for the benefit of a third party, e) other</p> <p>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</p> <p>f) Basic needs of the designated person, g) Reasonable professional fees for the provision of financial services, h) other</p>	<p>Reasonable professional fees for legal services.</p>
<p>Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply (“designated person”) and to whom the applicant has/had a relationship with</p>	<p>GTLK Europe DAC, No 2, Hume street, Dublin 2, Ireland – company number 512927</p>
<p>Describe the nature of the relationship between the applicant and the designated person(s)</p>	<p>Legal advisors and client.</p>
<p>Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided</p>	<p>Solicitor firm; services as per Section 150 terms of engagement.</p>

#### SECTION 4 – DETAILS OF THE TRANSACTIONS(S) CONCERNED

<p>Date of contract</p>	<p>[REDACTED]</p>
<p>Parties to the contract</p>	<p>GTLK Europe DAC and [REDACTED]</p>
<p>Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.</p>	<p>N/a</p>

<p><b>Date of the intended transaction(s).</b></p>	<p>Ongoing</p>
<p><b>Description of funds, economic resources or financial services to be supplied or obtained.</b></p>	<p>[REDACTED]</p>
<p><b>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</b></p>	<p>No.</p>
<p><b>Value of the economic resources or financial services to be supplied or obtained (in EUR).</b></p>	<p>[REDACTED]</p>
<p><b>Is the end user different from the contract customer?</b></p>	<p>No</p>

<p>Is the end user owned or controlled by a designated person?</p>	<p>N/a</p>
<p>Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?</p>	<p>No.</p>
<p>Dates of any transactions or shipments already made.</p>	<p>N/a</p>
<p>Dates of any future transactions or shipments.</p>	<p>[REDACTED]</p>

**SECTION 5 – BANKING DETAILS**



Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)

Electronic transfer

financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.

[REDACTED]

**BENEFICIARY**

[REDACTED]

	n/a Intermediary Bank SWIFT: n/a	
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**SECTION 6 – FURTHER DETAILS**

Provide any additional background information or explanation that would assist the Central Bank in considering this application	As above. [REDACTED]
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**SECTION 7 – DETAILS OF SUPPORTING DOCUMENTS**

[REDACTED] Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



Banc Ceannais na hÉireann  
Central Bank of Ireland

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Dublin 1

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Record 13

[REDACTED]  
[REDACTED]  
GTLK Europe DAC

2 Hume Street

Dublin 2

BY E-MAIL: [REDACTED]

15 June 2022

Re: **GTLK Europe DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 (the “Regulation”) to  
make sundry expense payments to 12 service providers**

**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to make sundry expense payments to service providers.

#### **Requirement for an authorisation**

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.



It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, sundry expense payments to service providers.

### **Assessment criteria set out in the Regulation**

#### ***Article 6(1) of the Regulation***

Article 6(1) of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or obligation that was concluded by, or arose for, the designated person before the date on which it was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) The funds or economic resources shall be used for a payment by a designated person; and
- b) The payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or obligation that was concluded by, or arose for, the designated person before the date on which it was listed in the Regulation, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.



### **Article 4(1)(a) of the Regulation**

Article 4(1)(a) of the Regulation provides for a derogation from Article 2, in respect of payments that are necessary to satisfy the basic needs of designated persons. In such circumstances, the competent authorities of the Member States may authorise, under such conditions, as they deem appropriate, after having determined that the funds or economic resources concerned are:

- a) Necessary to satisfy the basic needs of natural or legal persons, entities or bodies listed in Annex I to the Regulation, and dependent family members of such natural persons, including payments for foodstuffs, rent or mortgage, medicines and medical treatment, taxes, insurance premiums, and public utility charges; and
- b) Related to such payments that are “*essential activities without which the [company] would not be able to function legally*”.<sup>1</sup>

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is necessary to satisfy the basic needs of designated person, the Central Bank must have regard to the provisions of Article 4(1)(a) of the Regulation, together with any supporting Guidance from the European Commission.

### **Decision**

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application for authorisation, including but not limited to the Sanctions Derogation Application Forms, dated 28 April 2022 and 10 May 2022, and supporting documentation, including *inter alia*, contracts between GTLK Europe DAC and service providers, invoices from service providers, and the bank account details of the service providers.

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from two bank accounts [REDACTED] [REDACTED] in the name of GTLK Europe DAC, as set out at Appendix III, in respect of the following:

---

<sup>1</sup> As per the EU Commission Opinion, dated 29 August 2019, available here: [https://ec.europa.eu/info/sites/default/files/business\\_economy\\_euro/banking\\_and\\_finance/documents/190829-opinion-freeze-of-funds\\_en.pdf](https://ec.europa.eu/info/sites/default/files/business_economy_euro/banking_and_finance/documents/190829-opinion-freeze-of-funds_en.pdf)



- (i) The sundry expense payments to nine service providers and bank accounts, subject to the maximum amounts, listed in Appendix I to this letter. The authorisation for these payments is being granted under Article 6(1) of the Regulation; and
- (ii) The sundry expense payments to four service providers and bank accounts, subject to the maximum amounts, listed in Appendix II to this letter. The authorisation for these payments is being granted under Article 4(1)(a) of the Regulation.

This authorisation is subject to the following conditions:

- i. GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;
- ii. GTLK Europe DAC warrants that that the natural or legal persons that will receive any payments under this authorisation are not designated persons;
- iii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU sanctions regime; and
- iv. GTLK Europe DAC must not request an authorisation under the Regulation to make sundry expense payments to service providers from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

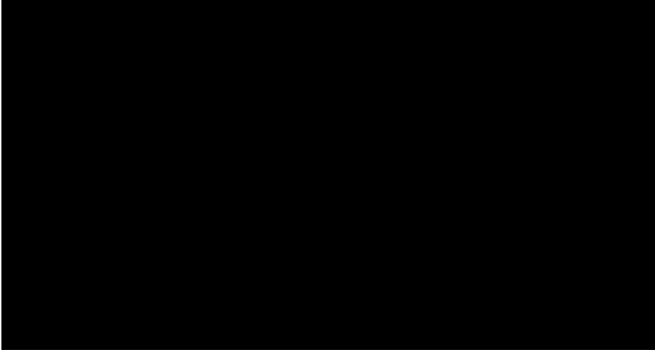
This authorisation is not transferable and GTLK Europe DAC remains at all times responsible for ensuring that it complies with all EU sanctions regimes.

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the sundry expense payments on behalf of GTLK Europe DAC under any EU sanctions regime, AML/CFT legislation, or any other applicable legislation. All third parties remain responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).



Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



**Appendix I – Sundry payments to service providers and bank accounts under Article 6(1) of the Regulation**

No.	Service provider name	Recipient Bank name	Recipient IBAN	Maximum Amount (EUR)
1				
2				
3				
4				
5				
6				
7				
8				
9				





**Appendix II – Sundry payments to service providers and bank accounts under Article 4(1)(a) of the Regulation**

No.	Recipient name	Recipient Bank name	Recipient IBAN	Maximum Amount (EUR)
1	[Redacted]			
2				
3				
4				



**Appendix III: Bank accounts of GTLK Europe DAC from which sundry expense payments will be made**

No.	Bank name	IBAN	Currency	Balance as at 14 June 2022
1	[REDACTED]			
2				



Record 14

[REDACTED]  
GTLK Europe DAC  
No 2, Hume Street,  
Dublin 2

23 June 2022

**Re: GTLK Europe Capital DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (the “Regulation”) to pay the [REDACTED] (the “Principal Paying Agent”) in order to provide for the payment of interest due on Eurobond III [REDACTED]**

**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe Capital DAC to the Central Bank of Ireland (the “Central Bank”) for an authorisation under the Regulation to pay the Principal Paying Agent in order to provide for the payment of interest due on Eurobond III [REDACTED]

#### **Requirement for an authorisation**

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “designated person”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.



It has been confirmed by you that GTLK Europe Capital DAC is 100% owned by GTLK Europe DAC, which is in turn 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 by Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe Capital DAC as although GTLK Europe Capital DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.<sup>1</sup>

As a result of the above, GTLK Europe Capital DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, payment to the Principal Paying Agent in respect of interest due on [REDACTED]

#### Assessment criteria set out in the Regulation

Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “designated person”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) the funds or economic resources shall be used for a payment by a designated person; and
- b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person before the date on which it was listed as a designated person, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.

---

<sup>1</sup> See EU Commission Best Practices for the effective implementation of restrictive measures:  
<https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf>



## Decision

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe Capital DAC in support of the application for authorisation, including but not limited to the Sanctions Derogation Application Form dated 13 April 2022, correspondence dated 19 April 2022 from GTLK Europe DAC to the Central Bank and supporting documentation,

[REDACTED]

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from the bank account in the name of GTLK Europe Capital DAC as set out in Appendix II, in respect of the following:

- i. Payment to [REDACTED] the Principal Paying Agent, in order to provide for the payment of interest due on 17 April 2022 under the terms of [REDACTED]

This authorisation is subject to the following conditions:

- i. This authorisation does not authorise any act which the person carrying out the act knows, or has reasonable grounds for suspecting, will result in funds being made available in breach of the Regulation, save as permitted under the authorisation granted under the Regulation;
- ii. GTLK Europe Capital DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU Sanction regime; and
- iii. GTLK Europe Capital DAC must not request an authorisation under the Regulation to pay the Principal Paying Agent in order to provide for the payment of interest due on the [REDACTED] from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

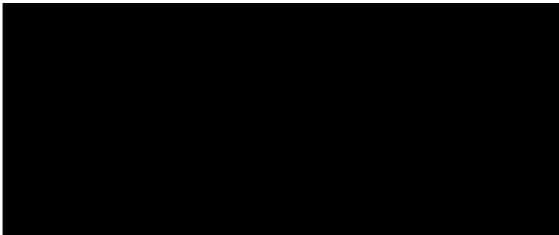


This authorisation is not transferable. GTLK Europe Capital DAC remains at all times responsible for ensuring that it complies with its financial sanctions obligations.

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the payment of interest on the [REDACTED] under any EU Sanctions Regime, AML/CFT legislation, or any other applicable legislation. All third parties remain at all times responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely



**Enforcement & Anti-Money Laundering Directorate**





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**Appendix I - Payment to the Principal Paying Agent in order to provide for the payment of interest due [REDACTED]**

Recipient Bank name	Recipient Bank account	Recipient SWIFT code	Paying account IBAN	Maximum Amount (USD)
[REDACTED]				



**Appendix II: Applicant bank account from which payment will be made to the Principal Paying Agent**

Bank	IBAN	Currency	Current balance
[Redacted content]			





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Record 15

[REDACTED]  
GTLK Europe DAC

2 Hume Street

Dublin 2

BY E-MAIL: [REDACTED]

28 June 2022

**Re: GTLK Europe DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 (the “Regulation”) to  
make payments to IT providers for the provision of IT related products and services**

**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to make payments to IT providers for the provision of IT related products and services.

### **Requirement for an authorisation**

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the



Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.

It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, fees to IT providers.

## Assessment criteria set out in the Regulation

### **Article 6(1) of the Regulation**

Article 6(1) of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or obligation that was concluded by, or arose for, the designated person before the date on which it was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) The funds or economic resources shall be used for a payment by a designated person; and
- b) The payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or obligation that was concluded by, or arose for, the designated person before the date on which it was listed in the Regulation, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.



### **Article 4(1)(a) of the Regulation**

Article 4(1)(a) of the Regulation provides for a derogation from Article 2, in respect of payments that are necessary to satisfy the basic needs of designated persons. In such circumstances, the competent authorities of the Member States may authorise, under such conditions, as they deem appropriate, after having determined that the funds or economic resources concerned are:

- a) Necessary to satisfy the basic needs of natural or legal persons, entities or bodies listed in Annex I to the Regulation, and dependent family members of such natural persons, including payments for foodstuffs, rent or mortgage, medicines and medical treatment, taxes, insurance premiums, and public utility charges; and
- b) Related to such payments that are “*essential activities without which the [company] would not be able to function legally*”.<sup>1</sup>

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is necessary to satisfy the basic needs of designated person, the Central Bank must have regard to the provisions of Article 4(1)(a) of the Regulation, together with any supporting Guidance from the European Commission.

### **Decision**

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application, including but not limited to the Sanctions Derogation Application Form, dated 28 April 2022, and supporting documentation, including *inter alia*, contracts between GTLK Europe DAC and IT providers, invoices from IT providers, bank account details of the IT providers, and ownership information of the IT providers.

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from the two bank accounts at [REDACTED] in the name of GTLK Europe DAC, as set out at Appendix III to this letter, in respect of the following:

---

<sup>1</sup> As per the EU Commission Opinion, dated 29 August 2019, available here: [https://ec.europa.eu/info/sites/default/files/business\\_economy\\_euro/banking\\_and\\_finance/documents/190829-opinion-freeze-of-funds\\_en.pdf](https://ec.europa.eu/info/sites/default/files/business_economy_euro/banking_and_finance/documents/190829-opinion-freeze-of-funds_en.pdf)



- (i) The payments to seven IT providers and bank accounts, subject to the maximum amounts, listed in Appendix I to this letter. The authorisation for these payments is being granted under Article 6(1) of the Regulation; and
- (ii) The payment to one IT provider and bank account, subject to the maximum amount, listed in Appendix II to this letter. The authorisation for these payments is being granted under Article 4(1)(a) of the Regulation.

This authorisation is subject to the following conditions:

- i. GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;
- ii. GTLK Europe DAC warrants that the natural or legal persons that will receive any payments under this authorisation are not designated persons;
- iii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU sanctions regime; and
- iv. GTLK Europe DAC must not request an authorisation under the Regulation to make payments to the IT providers from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

This authorisation is not transferable and GTLK Europe DAC remains at all times responsible for ensuring that it complies with all EU sanctions regimes.

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the payments covered by this authorisation on behalf of GTLK Europe DAC under any EU sanctions regime, AML/CFT legislation, or any other applicable legislation. All third parties remain responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).



Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



**Appendix I – Payments to providers and bank accounts under Article 6(1) of the Regulation**

No.	IT Provider	Recipient Bank	Recipient IBAN	Maximum Amount (EUR)	
				Existing obligations	Total max. monthly amount payable from July – December 2022 (inclusive)
1					
2					
3					
4					
5					
6					
7					



**Appendix II - Payments to providers and bank accounts under Article 4(1)(a) of the Regulation**

No.	IT Provider	Recipient Bank	Recipient IBAN	Maximum Amount (EUR)	
				Existing obligations	Total max. monthly amount payable from July - December 2022 (inclusive)
1					



**Appendix III: Bank account(s) of GTLK Europe DAC from which payments will be made**

No.	Bank name	IBAN	Currency	Balance as at 28 June 2022
1	[Redacted]			
2				





Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

### **Derogation/Authorisation Application made pursuant to EU Council Regulations relating to financial sanctions (restrictive measures)**

This application form should be used by natural and/or legal persons applying to the Central Bank of Ireland for a derogation to allow a transaction, service or activity to take place that would otherwise be prohibited under the relevant legal acts (EU Council Regulations) relating to financial sanctions. If a particular section of the application form is not considered relevant, it should be marked "N/A".

The Central Bank of Ireland can only grant a derogation where there are legal grounds to do so. These grounds are set out in the EU Council Regulations and should be considered and disclosed by applicants as part of the application. Applicants should also consult any relevant EU guidance as part of the application and refer to same within the application.

The Central Bank of Ireland may request additional information as part of its consideration of an application. Applications which are deemed incomplete, for example necessary documentation/information is not included, or which do not fully consider the derogation grounds, will be returned with a request that the relevant information/documents be provided. Incomplete applications will result in delays in the determination of the derogation application.

Completed application forms and supporting documentation should be submitted by e-mail to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)

**SECTION 1 - UNDER WHICH EU COUNCIL REGULATION(S) IS THE AUTHORISATION(S) SOUGHT?**

<p><b>Name of specific regime to which the application relates, together with relevant EU Council Regulation(s) reference(s) and article(s), under which the authorisation(s) is sought</b></p>	<p>Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “designated person”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:</p> <ul style="list-style-type: none"> <li>a) the funds or economic resources shall be used for a payment by a designated person; and</li> <li>b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.</li> </ul> <p>Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person before the date on which it was listed as a designated person, regard should be given to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.</p>
<p><b>URGENCY</b> Provide any details that may help determine the urgency of the case, for example, humanitarian needs</p>	<p>The Company's is due to make July's payroll to employees on [REDACTED] July. [REDACTED]</p> <p>[REDACTED]</p>
<p><b>Date of application</b></p>	<p>05 July 2022</p>

## SECTION 2 – DETAILS OF THE APPLICANT(S)

<p>Name of applicant(s)</p> <p>(include individual name and/or company name, together with registration number and any other identifying information)</p>	<p>GTLK Europe Designated Activity Company, a company incorporated and existing under the laws of Ireland (registered number 512927), having its registered office at 2 Hume Street, Dublin 2, Ireland.</p>
<p>Is the applicant a “designated person”<sup>1</sup>, or owned or controlled by a designated person? If so, please provide details</p>	<p>GTLK Europe DAC is 100% owned by GTLK JSC.</p>
<p>Describe the nature of the business performed by the applicant</p>	<p>Fully service international leasing platform for both Aircraft and Vessels.</p>
<p>Contact Name</p>	<p>[REDACTED]</p>
<p>Address</p>	<p>2 Hume street, Dublin 2, Ireland</p>
<p>Telephone number</p>	<p>[REDACTED]</p>
<p>Email address</p>	<p>[REDACTED]</p>

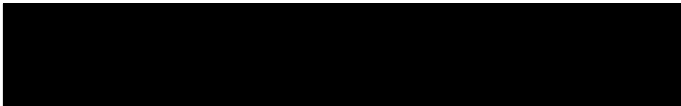
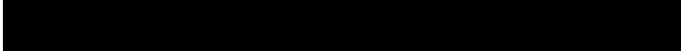
## SECTION 3 – DETAILS OF THE DEROGATION/AUTHORISATION SOUGHT

<p>Describe the reason for derogation/authorisation application. Please be specific as to why the derogation is being sought. For example, make clear if it is required to cover one or more of the following:</p> <p>a) To release frozen funds or economic resources, or make them available, directly or indirectly, to or for the benefit of a designated person,</p> <p>b) To release frozen funds or economic resources of a designated person to or for the benefit of a third party,</p> <p>c) To enable the provision of financial services, directly or</p>	<ul style="list-style-type: none"> <li>• To release frozen funds or economic resources of a designated person to or for the benefit of a third party.</li> <li>• Basic needs of the designated person</li> </ul>
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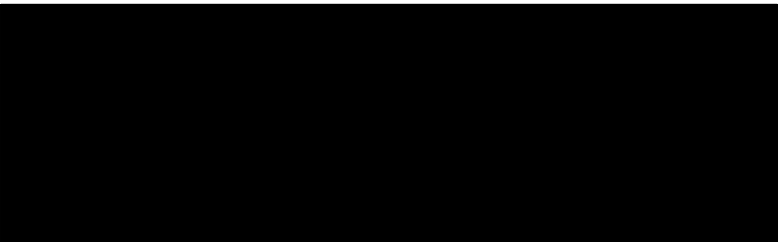
<sup>1</sup>“Designated person” in this form means a person, entity or body to whom the EU restrictive measure/sanction directly applies (that is, they are listed in the EU Council Regulations relating to financial sanctions).

<p>indirectly, to or for the benefit of a designated person,</p> <p>d) To enable the receipt of financial services, directly or indirectly, from a designated person to or for the benefit of a third party,</p> <p>e) other</p> <p>In addition, please make clear if the derogation is required to cover one of more of the following (non-exhaustive list):</p> <p>f) Basic needs of the designated person,</p> <p>g) Reasonable professional fees for the provision of financial services,</p> <p>h) other</p>	
<p>Provide the name(s) of person, entity and/or body to whom the restrictive measure(s)/sanction(s) apply ("designated person") and to whom the applicant has/had a relationship with</p>	<p>GTLK JSC.</p>
<p>Describe the nature of the relationship between the applicant and the designated person(s)</p>	<p>GTLK Europe DAC is 100% owned by the Designated entity.</p>
<p>Describe the nature of the business performed by the designated person(s), and provide a detailed description of service(s) provided</p>	<p>Fully service international leasing platform for both Aircraft and Vessels. Leasing of vessels and aircraft.</p>

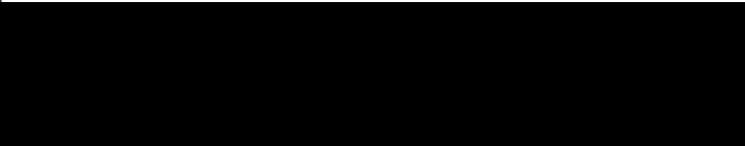

#### SECTION 4 - DETAILS OF THE TRANSACTIONS(S) CONCERNED

<p>Date of contract</p>	<p>Various.</p> <p>All employment contracts of GTLK Europe DAC staff have been provided as part of the previous derogation request, which was authorised on 25 May 2022.</p>
<p>Parties to the contract</p>	<ul style="list-style-type: none"> <li>• GTLK Europe DAC</li> <li>• Employees of GTLK Europe DAC</li> <li>• </li> <li>• </li> </ul>

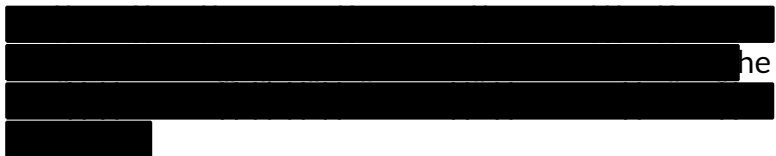
<p>Are any of the parties to the contract owned or controlled by a designated person? If yes, provide details.</p>	<p>Yes, GTLK Europe DAC is 100% owned by JSC GTLK.</p>
<p>Date of the intended transaction(s).</p>	<ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul>
<p>Description of funds, economic resources or financial services to be supplied or obtained.</p>	<p>[REDACTED]</p> <p>*</p>
<p>Are the funds, economic resources or financial services for humanitarian assistance activity (e.g. delivering or facilitating the delivery of assistance, including medical supplies, food, the provision of electricity, or other humanitarian purposes)?</p>	<p>No</p>
<p>Value of the economic resources or financial services to be supplied or obtained (in EUR).</p>	<p>[REDACTED]</p>
<p>Is the end user different from the contract customer?</p>	<p>Yes – end users are employees</p>
<p>Is the end user owned or controlled by a designated person?</p>	<p>No</p>
<p>Do you know or have reasonable suspicion that the funds, economic resources or financial services will be used by a designated person, or by a person acting on their behalf or at their direction, or by entities owned or controlled by them?</p>	<p>No</p>

<p>Dates of any transactions or shipments already made.</p>	<p>Previous Payroll payments (April, May, June) authorised by the CBI by a way of authorisation letter dated 25 May 2022.</p>
<p>Dates of any future transactions or shipments.</p>	

**SECTION 5 - BANKING DETAILS**

<p>Method of payment (e.g. cash, cheque, bank/electronic transfer, confirmed or unconfirmed letter of credit, or other method)</p>	<p>bank/electronic transfer</p>
<p>The financial institution(s) (including correspondent, intermediary and confirming banks, if applicable) through which payment will be made. Include IBAN, where relevant.</p>	<p><u>REMITTER</u></p>  <p><u>BENEFICIARY</u></p> 

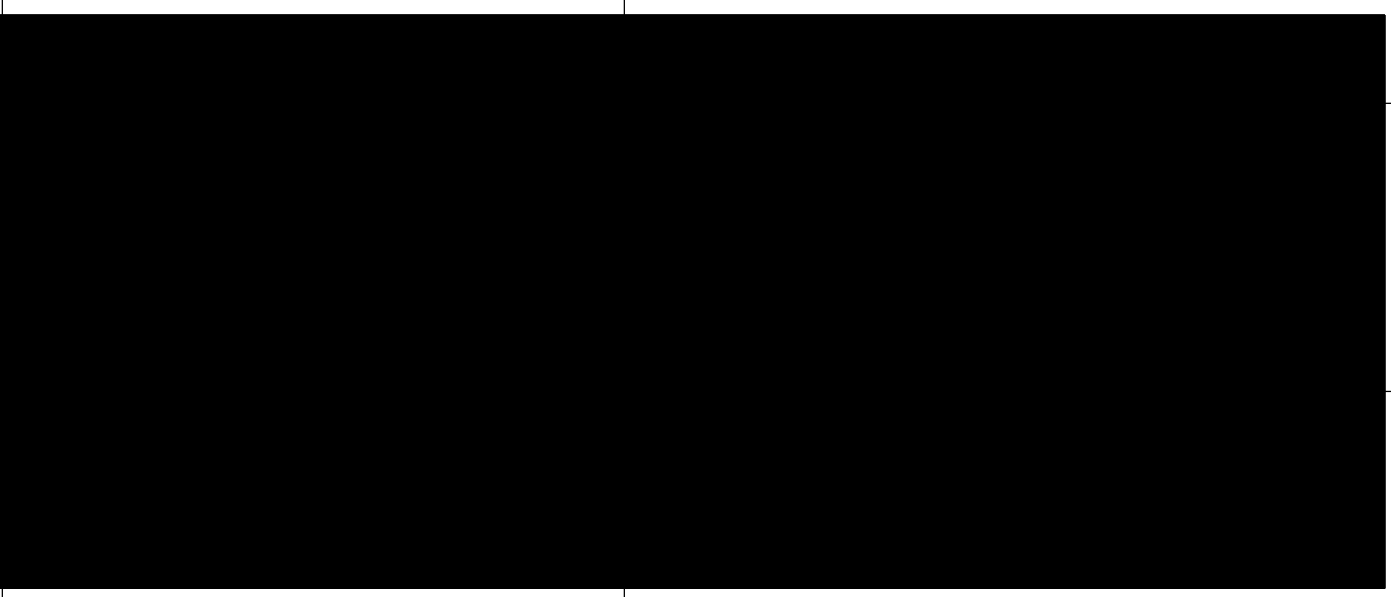
**SECTION 6 - FURTHER DETAILS**

<p>Provide any additional background information or explanation that would assist the Central Bank in considering this application</p>	
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**SECTION 7 - DETAILS OF SUPPORTING DOCUMENTS**

The Central Bank of Ireland expects the following documentation is submitted with the application (at a minimum):

- a) Power of attorney where a third party is submitting the application on behalf of the applicant(s)
- b) Evidence of relationship between the applicant(s) and the designated person(s)
- c) Relevant executed and dated contract(s)/agreement(s)
- d) Relevant invoice(s)
- e) Evidence of banking information
- f) Any other documents, as relevant to this application

Document name	Explanation of document/relevance to application
	



Record 17

[REDACTED]  
GTLK Europe DAC

2 Hume Street

Dublin 2

BY E-MAIL: [REDACTED]

8 July 2022

Re: **GTLK Europe DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 (the “Regulation”) to make a payment to [REDACTED] (the “Principal Paying Agent”)**

**Designated Person: JSC GTLK**

Dear [REDACTED],

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to pay the Principal Paying Agent in order to provide for the payment of interest due on Eurobond II [REDACTED]

#### **Requirement for an authorisation**

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.

It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 by Council Implementation Regulation (EU)





2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, a payment to the Principal Paying Agent in respect of interest due on [REDACTED].

### **Assessment criteria set out in the Regulation**

Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) The funds or economic resources shall be used for a payment by a designated person; and
- b) The payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or obligation that was concluded by, or arose for, the designated person before the date on which it was listed in the Regulation, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.



## Decision

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application, including but not limited to the Sanctions Derogation Application Form, dated 23 May 2022, and supporting documentation,

[REDACTED]

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from the bank account in the name of GTLK Europe DAC as set out in Appendix II to this letter, in respect of the following:

- i. Payment to the bank account in the name of the Principal Paying Agent as set out in Appendix I to this letter, in order for the Applicant to meet its contractual obligations under the terms of the [REDACTED]

This authorisation is subject to the following conditions:

- i. This authorisation does not authorise any act which the person carrying out the act knows, or has reasonable grounds for suspecting, will result in funds being made available in breach of the Regulation, save as permitted under the authorisation granted under the Regulation;
- ii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU Sanction regime; and
- iii. GTLK Europe DAC must not request an authorisation under the Regulation to pay the Principal Paying Agent in order to provide for the payment of interest due on the [REDACTED] [REDACTED] from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

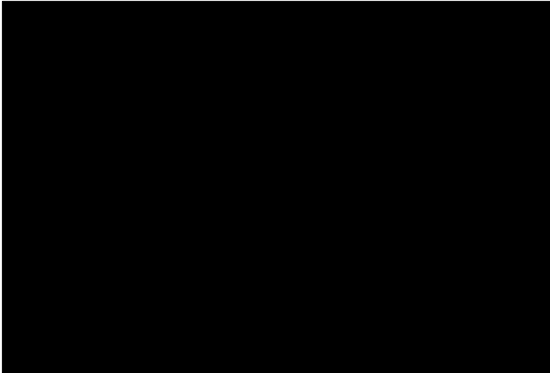
This authorisation is not transferable. GTLK Europe DAC remains at all times responsible for ensuring that it complies with its financial sanctions obligations.



This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the payment to the Principal Paying Agent under any EU sanctions regime, AML/CFT legislation, or any other applicable legislation. All third parties remain responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



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Baile Átha Cliath 1

PO Box 559  
Dublin 1

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**Appendix I – Payment to the Principal Paying Agent and bank account details**

Recipient Bank name	Recipient Bank account	Recipient SWIFT code	Maximum Amount (USD)
[Redacted content]			



**Appendix II: Applicant bank account from which payment will be made to the Principal Paying Agent**

Bank Name	Bank Account Name	IBAN	Currency	Balance as at 07/07/2022



Record 18

[REDACTED]  
GTLK Europe DAC

2 Hume Street

Dublin 2

BY E-MAIL ONLY: [REDACTED]

19 July 2022

**Re: GTLK Europe DAC – Authorisation requests under Council Regulation (EU) No 269/2014 (the “Regulation”) to release frozen funds intended for the payment of professional fees associated with the provision of legal services**

**Designated Person: JSC GTLK**

Dear [REDACTED],

I refer to the applications by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for authorisation under the Regulation to release frozen funds intended for the payment of professional fees associated with the provision of legal services by [REDACTED]

### **Requirement for an authorisation**

Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.



It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementing Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, professional fees associated with the provision of legal services.

### **Assessment criteria set out in the Regulation**

#### ***Article 4(1)(b) of the Regulation***

Article 4(1)(b) of the Regulation provides for a derogation from Article 2, in respect of payments that are intended exclusively for payment of reasonable professional fees or reimbursement of incurred expenses associated with the provision of legal services. In such circumstances, the competent authorities of the Member States may authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, under such conditions as they deem appropriate, after having determined that the funds or economic resources concerned are "*intended exclusively for payment of reasonable professional fees or reimbursement of incurred expenses associated with the provision of legal services*".

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is intended for payment of reasonable professional fees or reimbursement of incurred expenses associated with the provision of legal services, the Central Bank must have regard to the provisions of Article 4(1)(b) of the Regulation, together with any supporting Guidance from the European Commission.

### **Decision**

In assessing the applications for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the applications, including but not limited to:

- a) The Sanctions Derogation Application Forms, dated 16 June 2022 and 12 July 2022;



- b) [REDACTED]
- c) [REDACTED]
- d) [REDACTED]

Considering the nature of the work, it is accepted that the fees are for the provision of legal services and that they do not exceed what is reasonable in the circumstances. Therefore, having regard to the provisions of Article 4(1)(b) of the Regulation, as a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from the bank account(s) in the name of GTLK Europe DAC, as set out at Appendix II to this letter, in respect of the following:

- (i) The payment to [REDACTED] client bank account for the provision of legal services [REDACTED], subject to the maximum amount listed in Appendix I to this letter; and
- (ii) The payment to [REDACTED] client bank account for the provision of legal services from [REDACTED] subject to the maximum amount listed in Appendix I to this letter.

The authorisation for the release of frozen funds to cover the above professional fees is being granted under Article 4(1)(b) of the Regulation. To the extent that the provision of these legal services amounts to the making available of an economic resource, it is confirmed that this is authorised.

This authorisation is subject to the following conditions:

- (i) GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;





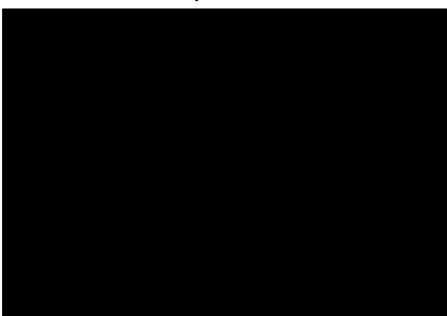
- (ii) GTLK Europe DAC warrants that the natural or legal persons that will receive any payments under this authorisation are not designated persons;
- (iii) GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU sanctions regime. In this regard, GTLK Europe DAC is reminded of its obligations under Article 9 of the Regulations; and
- (iv) GTLK Europe DAC must not request an authorisation under the Regulation to release frozen funds for the payment of professional fees associated with the provision of legal services from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

This authorisation is not transferable and GTLK Europe DAC remains at all times responsible for ensuring that it complies with all EU sanctions regimes. A new application will be required for authorisation for the payment of any professional fees exceeding the amounts set out in Appendix I, and/or relating to periods outside of those set out in Appendix I, and/or relating to the provision of legal services by legal professional other than [REDACTED].

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the payments covered by this authorisation on behalf of GTLK Europe DAC under any EU sanctions regime, AML/CFT legislation, or any other applicable legislation. All third parties remain responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



**Appendix I – Payments to legal provider and bank account under Article 4(1)(b) of the Regulation**

No.	Legal Provider	Recipient Bank	Recipient IBAN	Period legal services provided	Maximum amount (EUR) to cover legal services provided
1					
2					
Total Maximum Amount to cover professional fees provided					

**Appendix II: Bank account of GTLK Europe DAC from which payments will be made**

No.	Bank name	Account name	IBAN	Currency	Balance as at 18 July 2022
1					



## Record 19

[REDACTED]  
GTLK Europe DAC  
No 2, Hume Street,  
Dublin 2

22 July 2022

**Re: GTLK Europe DAC**

**Authorisation request under Council Regulation (EU) No 269/2014 (the “Regulation”) to make salary and associated payroll payments**

**Designated Person: JSC GTLK**

Dear [REDACTED]

I refer to the application by GTLK Europe DAC to the Central Bank of Ireland (the “**Central Bank**”) for an authorisation under the Regulation to make salary payments to its employees, as well as associated payroll payments, including tax, health insurance, pensions and income protection insurance.

### **Requirement for an authorisation**

It has been confirmed by you that GTLK Europe DAC is 100% owned by JSC GTLK. JSC GTLK was listed in Annex I to the Regulation on 8 April 2022 through Council Implementation Regulation (EU) 2022/581. Therefore, the Regulation extends to GTLK Europe DAC as although GTLK Europe DAC is not directly listed as a designated person in the Regulation, its assets must be frozen, and no funds or economic resources can be made available to it, because it is owned by a designated person.<sup>1</sup>

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<sup>1</sup> See EU Commission Best Practices for the effective implementation of restrictive measures:  
<https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf>



Pursuant to Article 2(1) of the Regulation, all funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, as listed in Annex I to the Regulation (hereinafter referred to as a “**designated person**”), shall be frozen. Furthermore, in accordance with Article 2(2) of the Regulation, no funds or economic resources shall be made available, directly or indirectly, to or for the benefit of designated persons.

As a result of the above, GTLK Europe DAC has been unable to make payments from its bank accounts in Ireland, which are now frozen. These payments include, *inter alia*, salaries of its employees.

### **Assessment criteria set out in the Regulation**

Article 6 of the Regulation provides for a derogation from Article 2, provided that a payment by a designated person, or a person owned and/or controlled by a designated person (hereinafter also referred to as a “**designated person**”), is due under a contract or agreement that was concluded before the date on which that designated person was listed in the Regulation. In such circumstances, the competent authorities of the Member States may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the competent authority concerned has determined that:

- a) the funds or economic resources shall be used for a payment by a designated person; and
- b) the payment does not result in funds or economic resources being made available, directly or indirectly, to or for the benefit of designated persons, or natural or legal persons, entities or bodies associated with them, as listed in the Regulation.

Accordingly, where a derogation from Article 2 is requested when a payment by a designated person is due under a contract or agreement that was concluded by the designated person before the date on which it was listed as a designated person, the Central Bank must have regard to the provisions of Article 6(1)(a) and Article 6(1)(b) of the Regulation.

### **Decision**

In assessing the application for authorisation, the Central Bank has relied on the information submitted by GTLK Europe DAC in support of the application for authorisation, including but not limited to the



Sanctions Derogation Application Form, dated 5 July 2022, and supporting documentation, including *inter alia*, the list of net salary and associated payroll payment amounts due for July, August and September 2022, the bank account details of the employees, and beneficiaries of associated payments and employment contracts.

As a competent authority with responsibility for the administration of the Regulation in Ireland, the Central Bank hereby authorises the release of certain frozen funds, from three bank accounts in the name of GTLK Europe DAC as set out at Appendix III, in respect of the following:

- (i) the salary payments to the [REDACTED] employees of GTLK Europe DAC, subject to the maximum amounts, listed in Appendix I to this letter. This authorisation covers salary payments for July, August and September 2022; and
- (ii) in order to facilitate the salary payments referred to at (i) above, funds (subject to the aggregate of the maximum amounts listed in Appendix I hereto) may be moved from GTLK Europe DAC's [REDACTED] to GTLK Europe DAC's [REDACTED] account listed in Appendix III [REDACTED] and/or to GTLK Europe DAC's [REDACTED] account listed in Appendix III [REDACTED]); and
- (iii) the associated payroll payments to the beneficiaries of GTLK Europe DAC, subject to the maximum amounts listed in Appendix II to this letter. This authorisation covers associated payroll payments for July, August and September 2022.
- (iv) in order to facilitate the associated payroll payments referred to at (iii) above, funds (subject to the aggregate of the maximum amounts listed in Appendix II hereto) may be moved from GTLK Europe DAC's [REDACTED] account listed in Appendix III ([REDACTED] to GTLK Europe DAC's [REDACTED] account listed in Appendix III ([REDACTED])).

The figures listed in Appendices I and II may be increased up to a maximum of 10% if necessary due to fluctuations in tax treatment of amounts payable under a listed employee's contract of employment.



This authorisation is subject to the following conditions:

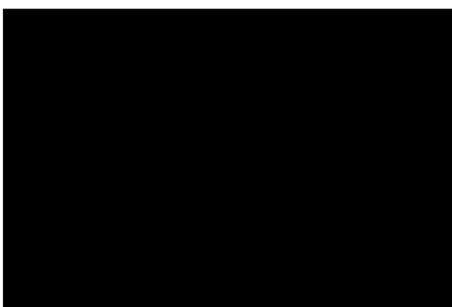
- i. GTLK Europe DAC remains at all times responsible for ensuring that the payments that are the subject of this authorisation will not result in any funds being made available to any designated persons, either directly or indirectly;
- ii. GTLK Europe DAC warrants that that the natural or legal persons that will receive any payments under this authorisation are not designated persons;
- iii. GTLK Europe DAC warrants that the payments under this authorisation are not part of a scheme to circumvent any EU Sanction regime;
- iv. GTLK Europe DAC must not request an authorisation under the Regulation to make salary payments to its employees from any other National Competent Authority in Ireland or any other Member State without prior permission from the Central Bank.

This authorisation is not transferable and GTLK Europe DAC remains at all times responsible for ensuring that it complies with all EU Sanctions Regimes.

This authorisation does not remove or suspend the obligations on third parties relying on this authorisation in order to process the salary and associated payments on behalf of GTLK under any EU Sanctions Regime, AML/CFT legislation, or any other applicable legislation. All third parties remain at all times responsible for ensuring that they comply with their legal obligations at all times.

If you have any queries in relation to this matter, please contact the Central Bank's Financial Sanctions Team at [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie).

Yours sincerely,



**Enforcement & Anti-Money Laundering Directorate**



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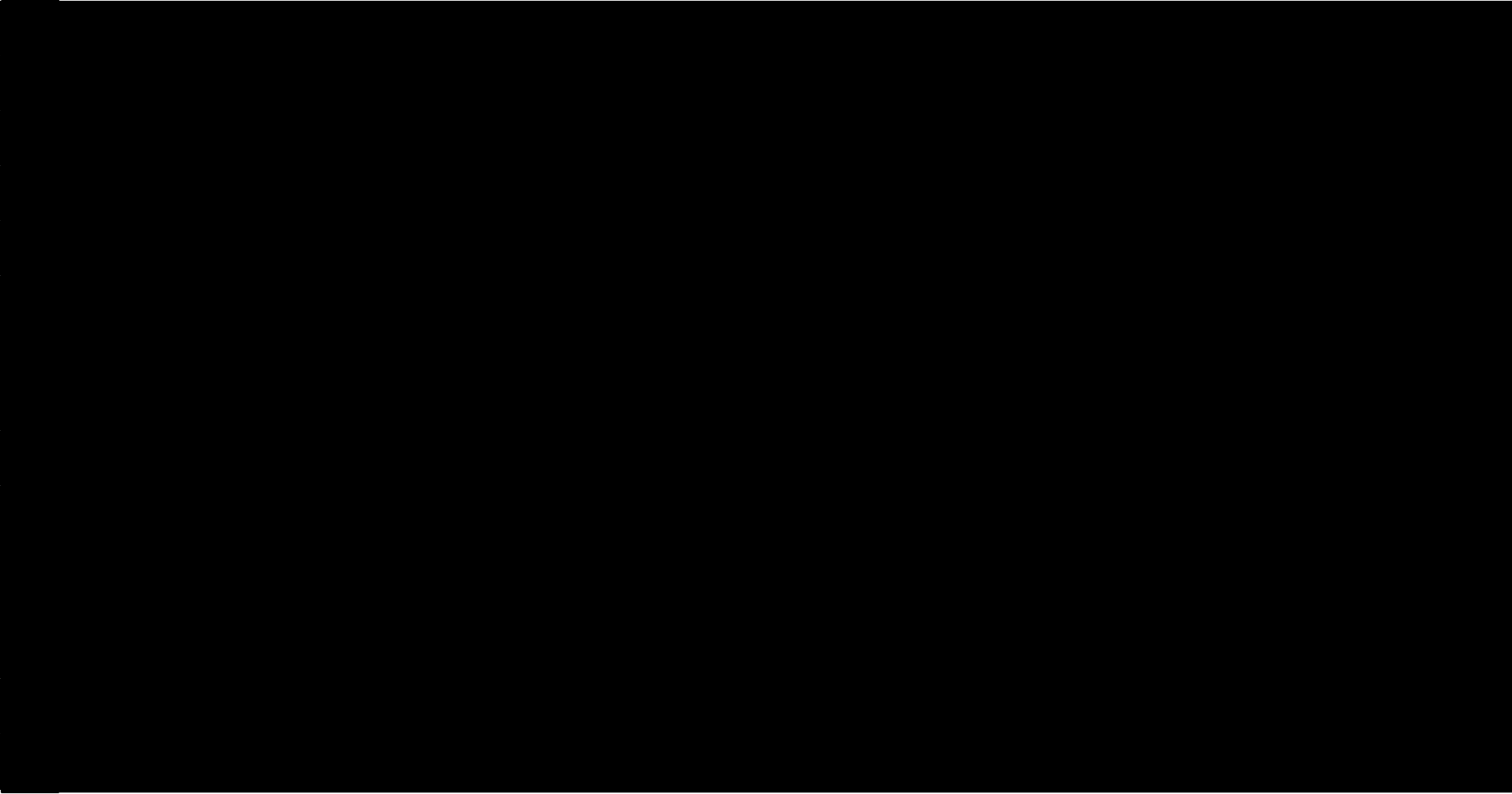
### Appendix I – Employee Salaries

No.	Employee name	Recipient Bank name	Recipient IBAN	Paying account IBAN	Maximum Amount (EUR) (plus 10% if required for tax purposes)		
					July 2022	August 2022	September 2022
[Redacted content]							



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**Appendix II – Associated Payroll Payments**

No.	Recipient name	Recipient Bank name	Recipient IBAN	Paying account IBAN	Maximum Amount (EUR) (plus 10% if required for tax purposes)		
					July 2022	August 2022	September 2022
1	[Redacted]						
2							
3							
4							



**Appendix III: Applicant bank accounts which may be used in order to facilitate and make salary and associated payments**

Bank	IBAN	Currency	Current balance
[Redacted content]			