



26.04.2018 № 1143/350000

Chairman Roger Wicker
555 Dirksen Senate Office Building
Washington, D.C. 20510

Co-Chairman Chris Smith
2373 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Wicker and Co-Chairman Smith:

On behalf of VTB Bank, I wanted to share our concerns about the Helsinki Commission's upcoming hearing, "The Long Arm of Injustice: Did a UN Commission Founded to Fight Corruption Help the Kremlin Destroy a Russian Family?" We are concerned that the witnesses who will testify before your commission will convey an incomplete set of facts and distort the record in a way to make the Bitkov family look like victims of persecution rather than criminals who absconded with millions of dollars to Guatemala in order to avoid paying their creditors in Russia more than \$158 million.

VTB Bank is Russia's second largest financial institution. The Russian government owns 60.9%, but the remaining shareholders are institutional investors and individual shareholders who hold Global Depository Receipts listed on the London Stock Exchange. Operationally, VTB is totally independent. We operate freely. Like other global financial institutions, the management team runs the bank for the benefit of clients and investors.

VTB has been a model corporate citizen. Among other things, VTB has worked to combat corruption and enhance corporate governance standards and is already fully compliant with Basel III capital standards, far ahead of many of our global competitors.

The United States and the European Union have sanctioned VTB in response to Russia's position in Ukraine – not because of anything VTB has done wrong. We look forward to the time when the sanctions will be lifted and VTB can once again be a trusted partner in the West. In the meantime, protecting VTB Bank's hard-earned reputation is critical.

VTB Bank first learned about this hearing from tweets by Mr. Bill Browder suggesting that he would testify and provide evidence that VTB Bank influenced Guatemala to imprison members of the Bitkov family. No one at the Helsinki Commission ever reached out to VTB Bank to attempt to validate these baseless allegations.

Everything we have done in the Bitkov case has been reasonable and appropriate. Every action we have taken comports with global norms. And we believe that any bank in our position would have taken the same steps. We want to refute unequivocally that VTB has acted improperly.

Furthermore, irrespectively of VTB's reasonable actions in this case, a joint statement from CICIG and Attorney General of Republic of Guatemala¹ in relation to Bitkovs' migration case emphasizes, among other things, that Guatemalan institutions have acted with independence and adherence to the law, with the sole purpose of ensuring the interests of Guatemalans.

Sincerely,

Alexey V. Lozovoy

General Counsel

VTB Bank (PJSC)

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, positioned to the right of the typed name.

¹ <http://www.cicig.org/index.php?mact=News,cntnt01,detail,0&cntnt01articleid=890&cntnt01returnid=1816>