



REPUBLIC OF ESTONIA
MINISTRY OF ECONOMIC AFFAIRS
AND COMMUNICATIONS



REPUBLIC OF ESTONIA
CONSUMER PROTECTION AND
TECHNICAL REGULATORY AUTHORITY

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Commerzbank AG
Kaiserplatz, 60311 Frankfurt am
Main, Germany

Our Ref: 08.07.2024 No 10-1/1857-1

Letter of support

Dear Dr Knof,

We are writing in connection with the activities of a Public Limited Company AS DBT (DBT), whose registered address is Koorma tn 7b, 74004, Estonia.

DBT operates an 'upper-tier establishment' in the meaning of Article 3(3) of Directive 2012/18/EU of the European Parliament and of the Council (Seveso-III Directive) in the Estonian Port of Sillamäe, where a dangerous substance, Anhydrous Ammonia, is being stored.

Since 8 April 2022 DBT's funds and economic resources have been frozen in accordance with Council Regulation (EU) No 269/2014 due to its connections to Mr. Viatcheslav Moshe Kantor, making it impossible for the company to carry out its normal business activities. Nevertheless, DBT has under the scrutiny of the Estonian competent authority been able to use its frozen funds to ensure the safety of the storage of the dangerous substance.

To date, DBT's funds have nearly depleted. In the coming months the company will most likely become permanently insolvent, making it impossible for DBT to ensure the proper conditions for the safe storage of the dangerous substance. Due to the reason that the handling of the dangerous substance requires a significant investment, it is at the same time not possible for DBT to simply liquidate such hazardous goods. The depletion of DBT's funds will create an immediate risk to the life and health of DBT's employees, the public, mainly the residents of Sillamäe, a nearby town with the population of approx. 13 000 people, and the environment.

It has come to our attention that a Public Joint Stock Company Acron (Acron) has made a declaration of intent to one of the Commerzbank AG's subsidiaries to make a bank transfer via its Commerzbank's account in Russia to DBT's frozen SEB account in Estonia.

To the best of our knowledge the Chairman of the Board of DBT, Mr. Evgeny Mashkov, has written an appeal to Commerzbank AG, where he has explained that the named transfer is essential for the company to fulfill its duties as an operator of an 'upper-tier establishment' in the meaning of Article 3(9) of the Seveso-III Directive.

Hereby the Ministry of Economic Affairs and Communications of the Republic of Estonia and the

Estonian Consumer Protection and Technical Regulatory Authority would like to confirm that DBT's reasoning is genuine and the receipt of additional funds is essential for taking the necessary measures to prevent a major accident. Thereby, we kindly request that Acron be allowed to swiftly complete its bank transfer to DBT as all transactions with DBT's frozen funds and economic resources, incl. the funds that shall be credited to DBT's frozen SEB account in Estonia, are subject to verification and require a prior authorisation of the Estonian Financial Intelligence Unit, the competent authority in the meaning of Art 1(c) of Council Regulation (EU) No 269/2014.

Please do not hesitate to contact us at Ahti.Kuningas@mkm.ee or Kristi.Talving@ttja.ee in case of any questions or concerns.

Yours sincerely,

Ahti Kuningas
Secretary General
Estonian Ministry of Economic Affairs and Communications

Kristi Talving
Director General
Consumer Protection and Technical Regulatory Authority