



Crediting and debiting cash from accounts and deposits with non-bank financial organisations outside of Russia



The Bank of Russia has established that crediting and debiting cash to/from accounts and deposits opened with non-banking financial organisations located outside of Russia can now take place without limitation.

The [Directive of the Bank of Russia](#) No. 5371-U of 24 December 2019 "On crediting cash to accounts (deposits) belonging to residents of the Russian Federation held with non-banking financial organisations located outside of the Russian Federation and debiting cash from such accounts (deposits)" registered by the Ministry of Justice of Russia on 26 March 2020 was published on 6 April 2020 and enters into force as of 17 April 2020.

You may recall that as of 1 January 2020 amendments to Federal Law No. 173-FZ of 10 December 2003 "On Currency Regulation and Currency Control" introduced special rules with regard to accounts (deposits) opened by Russian residents (individuals and legal entities) with financial organisations located outside Russia that are allowed by law to provide services relating to raising, holding, managing and investing funds and other financial assets from residents, as well as to execute other transactions for the benefit of residents or at the direct or indirect expense of residents.

Please note that the specific cases when residents are allowed to credit and debit cash from these accounts (deposits) are detailed by the abovementioned Directive.

The Directive does not have retroactive effect, therefore it is not clear whether credits and debits of cash executed via such accounts (deposits) for the period from 1 January to 16 April 2020 are lawful.

If you have any questions, our KPMG specialists will be pleased to answer your questions in regard to the above change and its impact on your specific circumstances.



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