



**THE FOUNDATION
FOR SECURE
MARKETS®**

#52336

Date: April 28, 2023

Subject: QIWI plc – Broker-to-Broker Settlement
Option Symbol: QIWI

Effective March 16, 2022, the National Securities Clearing Corporation (“NSCC”) no longer accepted QIWI exercise and assignment activity for settlement. As a result, all exercise and assignment activity for QIWI options beginning March 16, 2022, was subject to broker-to-broker settlement, as stated in OCC Information Memos #50189, #50212, #50785, #51193, and #51218. On July 22, 2022 the Office of Foreign Assets Control (“OFAC”) of the U.S. Department of the Treasury published Russia-related General License 45, which permitted, through 12:01 a.m. Eastern Daylight Time on October 20, 2022, certain transactions that are ordinarily incident and necessary to the wind down of financial contracts or other agreements that were entered into on or before June 6, 2022, and involved or were linked to debt or equity securities issued by an entity in the Russian Federation. **Russia-related General License 45 expired at 12:01 a.m. Eastern Daylight Time on October 20, 2022.**

Due to the expiration of Russian-related General License 45 on October 20, 2022, all remaining QIWI broker-to-broker activity that had not yet settled was subject to delayed settlement, as stated in OCC Information Memo #51218.

OCC discussed the implications of the expiration of General License 45 with OFAC. In connection with those discussions, **OFAC issued License No. RUSSIA-EO EO14024-2022-983909-4 (“License”) on April 27, 2023, which allows settlement of QIWI options exercise and assignment activity in QIWI shares.** The License authorizes (1) the purchase by U.S. persons of debt or equity issued by an entity in the Russian Federation where that purchase is ordinarily incident and necessary to the wind down of covered contracts; and (2) the facilitating, clearing, and settling of a purchase by U.S. persons of debt or equity issued by an entity in the Russian Federation, where that purchase is ordinarily incident and necessary to the wind down of covered contracts, including the performance of delivery obligations from prior exercises and assignments covering securities with ticker symbol QIWI.

As permitted by the License, QIWI options, which were previously subject to delayed settlement, will settle on a broker-to-broker basis. OCC will provide a copy of the License to each Clearing Member with outstanding settlement obligations for QIWI options.

Clearing Members that have QIWI exercise and assignment obligations are reminded to mark such obligations as settled on OCC’s broker-to-broker screen once such obligations have settled.

Disclaimer

This Information Memo provides an unofficial summary of the terms of corporate events affecting listed options or futures prepared for the convenience of market participants. OCC accepts no responsibility for the accuracy or completeness of the summary, particularly for information which may be relevant to investment decisions. Option or futures investors should independently ascertain and evaluate all

information concerning this corporate event(s).

The determination to adjust options and the nature of any adjustment is made by OCC pursuant to OCC By-Laws, Article VI, Sections 11 and 11A. The determination to adjust futures and the nature of any adjustment is made by OCC pursuant to OCC By-Laws, Article XII, Sections 3, 4, or 4A, as applicable. For both options and futures, each adjustment decision is made on a case by case basis. Adjustment decisions are based on information available at the time and are subject to change as additional information becomes available or if there are material changes to the terms of the corporate event(s) occasioning the adjustment.

ALL CLEARING MEMBERS ARE REQUESTED TO IMMEDIATELY ADVISE ALL BRANCH OFFICES AND CORRESPONDENTS ON THE ABOVE.

For questions regarding this memo, please email the Investor Education team at options@theocc.com. Clearing Member Firms of OCC may contact Member Services at 1-800-544-6091 or, within Canada, at 1-800-424-7320, or email memberservices@theocc.com.