

1. Scope of the Policy

Money laundering means participation in any transaction that attempts to conceal or distort the nature or origin of the funds obtained as a result of illegal activities. Money laundering includes proceeds from drug trafficking as well as the funds related to other illegal activities, including fraud, corruption, organised crime, terrorism and many other crimes. Usually, the process of money laundering consists of three stages:

Placement: entering the cash received as a result of illegal/criminal activities into financial or non-financial institutions.

Layering: separating the proceeds obtained as a result of criminal activity from their source through a series of complex financial transactions. Such transactions are created to prevent audits, conceal the origin of funds and ensure anonymity.

Integration: placing laundered proceeds back into the economy so that they re-enter the financial system as obviously legitimate funds.

The Policy is applied to all employees of the Company and its purpose is to establish key roles and responsibilities for the employees, as well as to ensure compliance with relevant legislation in working with clients and partners.

2. Client Approval Policy

A lack of understanding of the Client's information and investment goals can expose the Company to a number of risks. In order to minimise such risks, the Company has developed a Client Acceptance Policy. In cases where transactions are considered suspicious, the Company reserves the right to block the Client's account for the duration of the investigation.

3. Dynamic Risk Management

Risk management is a continuous process that occurs dynamically. Risk assessment is not an isolated event that occurs within a limited period of time. The Client's activity changes in the same way as the services and financial instruments provided by the Company do. The same can be applied to the financial instruments and transactions used for money laundering or terrorist financing.

4. Know Your Customer Rule (KYC)

The main method to prevent money laundering is to carry out the KYC procedures. Full knowledge of Clients, partners and the origin of the Client's funds can help identify unusual or suspicious behaviour, including fake IDs, non-standard transactions, changes in behaviour or other indicators that can be used to reveal money laundering.

The Client acceptance Process is as follows:

New client should provide necessary documents in accordance with the KYC procedures (passport, proof of residence, etc.)

Potential client should fill out a questionnaire that includes all the necessary information for the Company.

All the necessary information is registered in the client's profile.

Additional information may be requested on a case-by-case basis, depending on the risk profile, including personal verification.

The Company updates client identification information throughout the entire period of cooperation. The Company regularly checks the reliability and compliance of client identification data and other information that it keeps.

The client's inability or refusal to provide the requested data and/or information to verify their identity creates the basis for suspicion that the client is involved in money laundering or terrorist financing activities. In this case, the Company does not establish/terminate business relationship.