

**Exbitex Limited**  
**Anti-Money Laundering and Terrorist Financing Prevention,**  
**Customer Acceptance and sanctions policy**

THIS IS AN IMPORTANT DOCUMENT. PLEASE READ IT CAREFULLY AND KEEP IT FOR FUTURE REFERENCE.

Last updated: 15.02.2021

## **1. Objectives**

- 1.1. The purpose of this policy is:
- A. to establish the general framework with Company for the fight against money laundering (ML) and financing of terrorism (FT);
  - B. to provide guidance and clarity on customer acceptance and to ensure compliance with all applicable legal and regulatory requirements;
  - C. to ensure compliance with the applicable sanctions against persons and entities.
- 1.2. Company puts reasonable measures in place to control and to limit ML/FT risk, including dedicating the appropriate means.
- 1.3. Company is committed to high standards of anti-money laundering / counter the financing of terrorism (AML/CFT) compliance and requires management and employees to adhere to these standards in preventing the use of its products and services for money laundering or terrorism financing purposes.
- 1.4. The AML program of Company is designed to be compliant with the Laws of Hong Kong (the Hong Kong Special Administrative Region of the People's Republic of China).  
Unless otherwise specified, the Agreement is governed by the law in force in Hong Kong.
- 1.5. An AMLCO (Anti Money Laundering Compliance Officer) is in charge of the enforcement of the AML policy and procedures within the company.

## **2. Definitions**

### **2.1. Money Laundering means:**

- a) the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an activity to evade the legal consequences of that person's action;
- b) the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such an activity;
- c) the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such an activity;
- d) participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions referred to in points (a), (b) and (c).

Money laundering shall be regarded as such even where the activities which generated the property to be laundered were carried out in the territory of another Member State or in that of a third country.

### **2.2. Terrorism financing means:**

the provision or collection of funds, by any means, directly or indirectly, with the intention that they be used or in the knowledge that they are to be used, in full or in part, in order to carry out any terrorist act.

**2.3. Company – Exbitex Limited**, a company incorporated in Hong Kong, reg. No.: 2075926.

**2.4. Beneficial Owner:**

- 1) a natural person who, taking advantage of his or her influence, exercises the control over the transaction, operation or natural person / legal entity and in whose interests or favour or on whose account an operation or transaction is performed;
- 2) a natural person who, being the final owner of shares, units or voting rights of a legal entity or carries out the final control over the management of a business association in one of the following ways:
  - a) owns over 25% of a trust (fund) or other legal body, which controls and manages the assets of another legal entity in the amount of not less than 25%;
  - b) directly or indirectly owns or controls not less than 25% of shares, units or voting rights of a legal entity, including forms of bearer shares;
  - c) controls the management of the legal entity in any other way.

**2.5. Compliance department** - a subdivision of the company that performs the internal control. Within the framework of this Policy, the employees, performing the functions of compliance in the branches and representative offices, also belong to the compliance department's employees. At the same time, the official assignment of these persons to the compliance department of the parent company is not required.

**2.6. Contact Person** – is a structural unit of the Company (Compliance department), which is authorized to cooperate with the Unit and carry out the control over the proper fulfilment of the provisions of this Policy and current legislation in the sphere of legalization of financial means and terrorist financing. Contact Person shall be appointed by the Management Board and shall be accountable to the Management Board. Contact person, responsible for the direct implementation of measures to counter money laundering and terrorist financing in the Company and for the compliance with this Policy.

**2.7. Politically Exposed Person, PEP** – is a natural person who performs or has performed prominent public functions, their family members and close associates.

For the purposes of this Policy, a person performing prominent public functions is:

- a) heads of State, heads of government, ministers and deputy or assistant ministers;
- b) members of parliament or of similar legislative bodies;
- c) members of the governing bodies of political parties;
- d) members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances;
- e) members of courts of auditors or of the boards of central banks;
- f) ambassadors, chargés d'affaires and high-ranking officers in the armed forces;
- g) members of the administrative, management or supervisory bodies of State-owned enterprises;
- h) directors, deputy directors and members of the board or equivalent function of an international organisation.

The provisions of clauses a)-h) include positions in Hong Kong, contracting state of the European Economic Area or an institution of the European Union.

**2.8. Local politically exposed person (LPEP)**- means a person specified in clause 2.6 (PEP) who is or who has been entrusted with prominent public functions in Hong Kong, contracting state of the European Economic Area or an institution of the European Union.

**PEP and LPEP screening must be made** <https://namescan.io/FreePEPCheck.aspx> or google.com.

**2.9. A family member of a PEP and LPEP is:**

- a) his or her spouse;
- b) a partner equal to a spouse under the law of the person's country of residence or a person who as of the date of carrying out the transaction had shared the household with the person for no less than a year;

- c) his or her children and their spouses or partners within the meaning of clause h);
- d) his or her parent.

**2.10. A close associate of a PEP and LPEP is:**

- a) a natural person who has a close business relationship with a person performing prominent public functions or with whom a person performing prominent public functions is the joint beneficial owner of a legal person or contractual legal arrangement;
- b) a person who as a beneficial owner has full ownership of a legal person or contractual legal arrangement, which is known to have been founded for the benefit of the person performing prominent public functions.

A natural person shall not be deemed the PEP/LPEP if he/she at least within one year by the time of making the transaction did not exercise the functions of the PEP/LPEP, the same concerns the family members and the closest co-workers of such person.

**2.11. Source of funds** – means the origin of the funds involved in a business relationship or occasional transaction. It includes both the activity that generated the funds used in the business relationship, for example the client’s salary, as well as the means through which the client’s funds were transferred.

**2.12. Source of wealth** – means the origin of the client’s total wealth, for example inheritance or savings.

**2.13. Unit** – is all Hong Kong state structures that control the activities of companies in the financial part of the legislation on combating money laundering and preventing the financing of terrorism.

### **3. Client acceptance policy**

3.1. Several elements require the establishment of a client acceptance policy, in particular:

- 3.1.1. avoiding Company entering into business relations with persons who might involve it in money laundering or terrorism financing transactions;
- 3.1.2. meeting a legal / regulatory requirement;
- 3.1.3. ensuring that the sales network has a good knowledge of the client (KYC) and can exercise the due diligence appropriate to their level of risk from the start of the client relations;
- 3.1.4. applying the risk-based approach run by Company in categorising clients in relation to risk criteria.

3.2. As a general rule, clients who may be accepted by Company are persons or entities:

- 3.2.1. fully identified in accordance with the company’s procedures, and
- 3.2.2. with a sustainable source of income, and where the reality of that can be checked on the basis of credible external sources, and
- 3.2.3. when such financial relations will be active, diversified and over the long term.

3.3. Company will not accept client relations with persons or entities not meeting the above acceptance criteria, or whose legitimate intentions do not immediately appear to be sufficient, or included in the Hong Kong, Great Britain, United States or European Union lists of persons or entities under financial sanction, or carrying on a commercial activity, which is considered by Company as particularly at risk. Moreover, Company does not authorise the opening of anonymous.

### **4. Minimum standards**

4.1. Company has established standards regarding Know-Your-Client (“KYC”). These standards require due diligence on each prospective client before entering into a business relationship via identification and verification of his identity and his representatives and beneficial owners on the basis of documents, data or information obtained from a reliable and independent source compliant with the domestic and European AML/CFT legislation and regulation.

- 4.2. Identification as a procedure for realization of the “Know Your Customer” principle consists of carrying out by the Company of an all-round check and analysis of documents of both a prospective client, prior to entering into business relations with him/her, and clients to which the company already renders its services, and provides for the following stages:
- a) conducting surveys of the client to identify the client or the individual involved in transactions;
  - b) checking the reliability and completeness of information, the documents and data provided by clients as well as checking the presented information on the basis of information obtained from reliable and independent sources;
  - c) analysis of documents specifying legal status of a client as well as the credentials of persons entering into contracts;
  - d) determination of the beneficial owners, gathering information about the structure of ownership and control of legal persons, based on the information provided during the pre-contractual negotiations, or other information obtained from reliable and independent sources;
  - e) determination of a client’s scope of activity, analysis of information concerning its business reputation;
  - f) periodically update data about the clients, used for the identification, update of relevant documents, data and information;
  - g) gathering information on the origin of the client’s wealth and source of funds.
- 4.3. Interpretation of the KYC principle begins with identification of the client by means of the necessary identification documents.
- 4.4. Identification of a natural person (resident/non-resident) shall be performed on the basis of an identification document<sup>1</sup> as well as other peer documents, including the ones established by the legislation of Hong Kong, which allow to determine the following data:
- 4.4.1. surname, name, patronymic (unless the law or a national custom provide otherwise);
  - 4.4.2. personal code;
  - 4.4.3. date and place of birth;
  - 4.4.4. information on the identification document<sup>5</sup> (type, series and number, date of issue and issuing authority);
  - 4.4.5. residence address<sup>2</sup>;
  - 4.4.6. place of work (sphere of activity);
  - 4.4.7. sample of signature;
  - 4.4.8. contact information (phone number, e-mail).

---

<sup>1</sup> an identity card; a digital identity card; a residence permit card; an Hong Kong citizen’s identity card; a diplomatic passport; a seafarer’s discharge book; an alien’s passport; a temporary travel document; a travel document for a refugee; a certificate of record of service on ships; a certificate of return; a permit of return; the European travel document for return for the purposes of Regulation (EU) 2016/1953 of the European Parliament and of the Council on the establishment of a European travel document for the return of illegally staying third-country nationals, and repealing the Council Recommendation of 30 November 1994 (OJ L 311, 17.11.2016, pp.13-19).

<sup>2</sup> For confirmation of the client’s place of residence the company may request a Utility bill, housing lease contract, extract from the register of tenants (register), etc

- 4.5. **Identification of a legal entity (resident/non-resident)** shall be performed on the basis of constituent documents<sup>3</sup>, documents on the state registration<sup>4</sup> and other documents which allow to establish the following data:
- 4.5.1. business name;
  - 4.5.2. legal and organizational form;
  - 4.5.3. registration number or code, place and name of the registering authority, date of registration;
  - 4.5.4. legal address and place of location;
  - 4.5.5. sphere of activity;
  - 4.5.6. availability of operating license (if applicable);
  - 4.5.7. data about the managers, and/or members of the Management Board of the company, and/or directors of the legal entity<sup>5</sup>, including their names and surnames, personal codes/dates of birth, as well as their powers;
  - 4.5.8. data on beneficial owner;
  - 4.5.9. contact information of the legal entity (phone numbers, e-mail address);
  - 4.5.10. a sample of signature and seal (if applicable).
- 4.6.A list of documents includes the following documents:
- 4.6.1. the registry card of the relevant register or equal;
  - 4.6.2. the registration certificate of the relevant register or equal;
  - 4.6.3. the identification documents of the person entitled to act without a power of attorney on the behalf of a legal entity;
  - 4.6.4. power of attorney for an authorized person entitled to carry out operations/transactions with securities and other financial instruments, as well as to perform other actions as a part of client relations on the behalf of a legal entity; Power of attorney is legalised or certified by a certificate replacing legalisation (apostille), unless otherwise provided for in an international agreement.
- 4.7. Company carries out the identification whether an individual is a PEP, family member or a close associate of a PEP, or whether an individual is person's place of residence or seat is in high-risk third country and / or country that is subject to sanctions, embargos or similar measures, has significant levels of corruption or other criminal activity, and/or provides funding or support for terrorism or extremist activities or whether legal entities directly or indirectly owned or controlled by such organizations or persons, or a natural person or legal entity acting on behalf or under the control of such organizations or persons, the Company may refer to any information which is in its possession, or which is publicly known.
- 4.8. The Company may refer to any of the following sources of information:
- a) commercial databases;
  - b) Internet and media searches;
  - c) In-house databases and information;
  - d) Client's self-declaration; and/or
  - e) High-risk and other monitored jurisdictions issued by FATF<sup>6</sup>;
  - f) Information provided by authorities.

---

<sup>3</sup> The constituent documents include the articles of association and/or the founders' agreement taking into account the peculiarities of each jurisdiction. The constituent documents should be up-to-date as of the date of submitting them to the Company.

<sup>4</sup> A document certifying the state registration of a legal entity is an extract from the register of legal entities or a certificate of registration or an equivalent document (depending on the country of registration of a legal entity), issued not earlier than 6 months before it is submitted to the Company.

<sup>5</sup> The documents should be provided on the election or appointment of the management of a legal entity - Operating Agreement, Statement of Incorporator, Initial resolution of the Members, Shareholder Declaration, Certificate etc.

<sup>6</sup> High-risk and other monitored jurisdictions: <http://www.fatf-gafi.org/countries/#high-risk>

- 4.9. The Company shall not enter into contractual relations with the clients not having physical presence in any country (so-called shell companies) or in respect of which the negative information has been received, in particular, in the sphere of prevention of legalization of financial means and terrorist financing.
- 4.10. The Company shall not open accounts for anonymous holders.
- 4.11. The Company shall build the relations with clients on the basis of mutual trust.
- 4.12. In implementation of Due Diligence measures the Company may use the information received in a written form from a credit or financial institution, registered in the commercial register of Hong Kong or acting in an EU member-state or in a state where the similar requirements to prevention of legalization of financial means and terrorist financing are applied.
- 4.13. The representation, branch or majority-owned subsidiary in that Member State of the Company shall apply the Due Diligence measures that are similar to those listed in this Policy, and shall set the requirements for the collection and storage of data, which are at least equivalent to those established by the present Policy and established in the Company Principles of processing and transfer of clients' personal data.
- 4.14. Risk Profile calculation
- 4.15. To assist in determining the level of AML/CFT due diligence to be exercised with regard to the client, a "Compliance" risk profile is calculated first of all on entry into relations (Low, Medium, High), and is then recalculated daily.

## **5. Application of the simplified and enhanced due diligence measures**

- 5.1. The Company may apply the simplified due diligence measures listed in clause 3.2. of this Policy in a simplified manner in the case of minor (minimal) risk of money laundering or terrorist financing under the conditions arising from the Company Risk Assessment and Risk appetite Procedure, current laws and the guidelines of the European supervisory authorities regarding risk factors.
- 5.2. Upon opening an investment account or in case of already established by the Company business relationship, the simplified due diligence (SDD) measures may be applied to clients with low risk<sup>7</sup>, if the client involved in a transaction is:
- 5.3. public legal entity incorporated in Hong Kong and governed by public law established in Hong Kong;
- 5.4. a company, which listed on regulated market with sufficient transparency regarding the beneficial owner;
- 5.5. a governmental institution or another institution performing public legal functions, registered in Hong Kong;
- 5.6. an institution of the European Union and Hong Kong;
- 5.7. the person who is a resident of Hong Kong, or third country that has effective AML/CFT systems or effectively implemented FATF recommendations.
- 5.8. At least the following factors may be deemed reducing the geographic risks - the client's place of residence or seat is:
- 5.9. a contracting state of Hong Kong, or the European Economic Area;

---

<sup>7</sup> DIRECTIVE (EU) 2015/849 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 May 2015 Art 16, Annex 2

5.10. a third country that has effective AML/CFT systems or where the requirements of FAFT are effectively implement.

5.11. The simplified due diligence measures are not applied in a simplified order if arise a suspicion of AML/CTF or has doubts about the veracity of the information obtained.

5.4. The enhanced due diligence (EDD) measures shall be applied when there is a medium or high risk of legalization of financial means and terrorist financing in order to manage and mitigate higher risk situations.

5.5. The enhanced due diligence measures shall be applied if:

- a) person's or client's identification or verification of the presented information has been carried out without the personal presence of the person or the client;
- b) during identification of a person or a client there arises a reasonable suspicion in authenticity or validity of information and documents or identification of the beneficial owner;
- c) a person, client or its representative, participating in a transaction, is a Politically Exposed Person, their family member or a close associate;
- d) the client is a legal entity, the ultimate beneficiary of which is a Politically Exposed Person of Hong Kong, contracting state of the European Economic Area (EEA) or a third country;
- e) the client is a legal entity, the location of which is in the third state, where the sufficient measures to combat money laundering and terrorist financing are not applied, or the state does not perform the international cooperation in combating money laundering and terrorist financing; or that is considered a low tax rate territory;
- f) the client is a legal entity, in regard to activities of which, the persons having the right of representation or actual beneficiaries there have been previously known a suspicion that the above persons may be related to money laundering and/or terrorist financing;
- g) the client is related to medium or high-risk, according to Risk Assessment and Risk appetite Procedure (which certainly apply if the client is a resident of a higher-risk geographic area);
- h) the client is a cash-intensive business;
- i) the client is a legal person or a legal arrangement, which is engaged in holding personal assets;
- j) the client is a legal entity that has nominee shareholders or bearer shares or a company whose affiliate has nominee shareholders or bearer shares;
- k) the ownership structure of the client company appears unusual or excessively complex, given the nature of the company's business.

5.6. In cases provided for in clause 5.5 of the present Policy, at least one or more of the following enhanced due diligence measures shall be applied:

- a) obtaining additional information about the client from reliable and independent sources, information available through public databases, the Internet, etc;
- b) gathering additional information on the purpose and nature of the business relationship, transaction or operation;
- c) the application of due diligence measures regarding the person or their representative while being at the same place as the person or their representative;
- d) obtaining the information from a credit or financial institution (in which the client's account is opened), registered in Hong Kong, or registered or located in the contracting state of the European Economic Area or in a state where there are valid the equivalent requirements to combat money laundering and terrorist financing, and if this credit institution has identified the person in his immediate presence before the employee of the credit or financial institution;

- e) when opening an account to request a letter of recommendation from another credit or financial institution (in which the client's account is opened);
- f) additional check of authenticity and reliability of provided documents and information contained therein including by specifying requirements of their notarial certification, availability of consular legalization or apostille unless a simplified procedure for documents legalization is provided for by international agreements with Hong Kong; obtaining additional information about the source and origin of the funds and wealth of the client;
- g) implementation of enhanced monitoring of business relations by increasing the number of inspections and determination of the nature of operations which require further verification, including reassess the client's risk profile not later than six months after the establishment of the business relationship.

5.7. The Company implement enhanced due diligence measures in respect of clients from the high-risk third countries and applies the following due diligence measures:

- a) gathering extend of the additional information about the client and its beneficial owner;
- b) gathering extend of the additional information on the planned substance of the business relationship;
- c) gathering extend information on the origin of the funds and wealth of the client and its beneficial owner;
- d) gathering extend information on the underlying reasons of planned or executed transactions;
- e) receiving permission from the member of Management Board to establish or continue a business relationship;
- f) monitoring of a business relationship by increasing its number and frequency.

## **6. Due Diligence of Politically exposed person**

6.1. The Company, upon concluding business relations or during ongoing due diligence, takes all possible efforts to identify PEP/LPEP, their family member or a person known to be close associate and applies to them enhance due diligence measures.

6.2. In the case, where client or beneficial owner, participate in transactions is a PEP/LPEP, a family member or a close business associate person (client or beneficial owner) additional measures are apply:

- 6.2.1. obtains approval from the Member of the Management board to establish or continue a business relationship with the person;
- 6.2.2. establish the origin of the wealth and the sources of the funds;
- 6.2.3. monitors operations in an enhanced manner.

6.3. The Company considers the client as PEP/LPEP, at least 12 months after the termination of important public functions. The company has the right to consider client as PEP/LPEP for a longer time, if there are reasonable grounds for it.

## **Organization of internal control**

### **7. Ongoing client due diligence**

- 7.1. A periodically risk-based review is carried out to ensure that client-related data or information is kept up-to-date.
- 7.2. The current KYC review process regarding the other client categories is essentially based on an "awareness principle" following the examination of a dedicated file by the AML team. This awareness principle consists in asking the client's relationship manager henceforth to closely perform a periodic KYC review of the client.

### **8. Ongoing transaction monitoring**



8.1.AML team ensures that an “ongoing transaction monitoring” is conducted to detect transactions which are unusual or suspicious compared to the client profile.

8.2.This transaction monitoring is conducted on two levels:

The first Line of Control:

- 8.2.1. Company makes its network aware so that any contact with the client, account holder or authorised representative must give rise to the exercise of due diligence on transactions on the account concerned. In particular these include - requests in relation to means of payment or services on the account.
- 8.2.2. The specific transactions submitted to the relationship manager, possibly through their Compliance Manager, must also be subject to due diligence.
- 8.2.3. Determination of the unusual nature of one or more transactions essentially depends on a subjective assessment, in relation to the knowledge of the client (KYC), their financial behaviour and the transaction counterparty.
- 8.2.4. The transactions observed on client accounts for which it is difficult to gain a proper understanding of the lawful activities and origin of funds must therefore more rapidly be considered atypical (as they are not directly justifiable).
- 8.2.5. Any Company staff member must inform the AML team of any atypical transactions which they observe and cannot attribute to a lawful activity or source of income known of the client.

**The second line of control:**

- 8.2.6. The first line of control is supplemented by a risk-based automated second line of control, including an increased monitoring of transactions of clients considered as high risk.
- 8.2.7. To accompany these due diligence measures, other more structural measures are progressively put in place, like the limitation of cash deposits, applicable for each category of client.

## **9. Contact person**

9.1.The AMLCO of the Company performs the functions of the Contact Person.

9.2.Contact person is independent in his actions and decisions from other structural departments of the Company and is subordinated directly to the Management Board of the Company.

9.3.The Contact Person may combine his responsibilities with performing of other functions. Combining the functions performed by the Contact Person should not lead to a conflict of interests and hinder making of independent decisions within the Regulation on the Company's internal control.

9.4.The Company informs and coordinates with the Unit and competent supervisory authority the appointment of the Contact Person.

9.5.The Contact person, in particular, has the following responsibilities:

- 9.5.1. monitors in the Company the compliance with the laws of Hong Kong and other countries where the Company operates concerning the legalization of financial means and terrorist financing, the EU Directives, the present Policy and other internal documents of the Company;
- 9.5.2. monitors the legislation and organizes the subsequent amendment of the Policy;
- 9.5.3. conducts the training to the employees of the Company on the issues concerning opposing the legalization of financial means and terrorist financing;
- 9.5.4. consults the employees of the Company on the issues concerning opposing the legalization of financial means and terrorist financing;

- 9.5.5. cooperates and exchanges information with the Contact Persons of legal entities included into a consolidated group with the Company;
  - 9.5.6. collects and analyses the information concerning suspicious operations/transactions or operations/transactions arousing suspicions of legalization of financial means and terrorist financing;
  - 9.5.7. makes a decision concerning necessity to send a notification to the Unit, prepares and sends to the Unit the corresponding notifications;
  - 9.5.8. informs the Management Board of the Company of the revealed violations of the laws of Hong Kong, EU Directives or other countries concerning AML/CFT and of the provisions of the present Policy;
- 9.6. The Contact person is entitled:
- 9.6.1. to submit to the Management Board the proposals concerning the amendment of this Policy;
  - 9.6.2. to require from the employees of the Company the submission of documents and information necessary for execution of Contact Person's functions;
  - 9.6.3. to request from the employees of the Company the written explanations on questions arisen in execution by them of their obligations and require from them to remedy the deficiencies revealed by the Contact Person;
  - 9.6.4. receive training in the field.
- 9.7. The Contact person quarterly submit to the Management Board a written report with the results of application of Due Diligence measures (not later than in 30 days from the quarter end date).
- 9.8. The report must contain:
- 9.8.1. information about all the revealed violations of the Money Laundering and Terrorist Financing Prevention legislation of Hong Kong and/or other countries, about the reasons for committing relevant violations and the persons responsible for them;
  - 9.8.2. recommendations on prevention of similar violations and increasing the effectiveness of the due diligence measures;
  - 9.8.3. list of the clients and other persons, the notifications about whom were sent to the Unit, and the number of such notifications.

## **10. Detecting suspicious operations and submitting information**

- 10.1. In case of detection by the Company's employee a suspicious operation/transaction, which corresponds to the criterion of the suspicious character of the operation (suspicious operation), the employee, who has conducted or detected such an operation, shall immediately inform about it the Contact Person.
- 10.2. The notification about suspicions transaction to the Contact Person may be done in any convenient way: directly by email at [info@exbitex.com](mailto:info@exbitex.com)
- 10.3. In case of detection of the suspicious operation/transaction, the Company, if necessary, implements the following additional due diligence measures:
  - 10.3.1. requests a client to provide necessary explanations, including additional information clarifying economical meaning of a suspicious operation/transaction;
  - 10.3.2. pays increased attention in accordance with this Policy to all operations/transactions of this client;

- 10.3.3. update the identification data of the client (for instance, establish the source and destination of the funds);
- 10.3.4. conduct updating risk client assessment;
- 10.4. If the Contact Person, after studying the situation, determines the attributes in respect of which there are grounds for suspicion in money laundering and/or terrorist financing, the Contact person shall send a notification to the Unit no later than in 2 (two) working days from the date when it became known about the relevant circumstances.
- 10.5. The Contact Person shall give notice to the Unit in a form of an electronic document signed by electronic (digital) signature, including also using the digital form on the official website of the Unit.

## **11. Record keeping**

- 11.1. Records of data obtained for the purpose of identification must be kept for at least five years after the business relationship has ended.
- 11.2. Records of all transaction data must be kept for at least five years following the carrying-out of the transactions or the end of the business relationship.

## **12. Training**

- 12.1. Company has developed different ways of training and awareness in order to keep its staff aware of the AML/CFT duties.
- 12.2. The training and awareness programme is reflected in its usage by:
  - 12.2.1. where required an AML e-learning training programme in accordance with the latest regulatory evolutions;
  - 12.2.2. academic AML learning sessions for all new employees. The content of this training programme has to be established in accordance with the kind of business the trainees are working for and the posts they hold. These sessions are given by an AMLCO working in Company's AML team.

## **13. Sanctions**

- 13.1. To ensure compliance with the applicable sanctions against persons and entities, Company has put in place a list matching system in order to compare the names of its customers with official lists from Hong Kong, the European Union, the OFAC or the UN.
- 13.2. The restrictions on financing of sanctioned companies are carried out by blocking client access to the services and products and refusing other forms of financing that fall within the sanctions scope.
- 13.3. EU sanctions screening is made through: <https://sanctionsmap.eu/#/main> US sanctions screening: <https://sanctionssearch.ofac.treas.gov/>