AML and KYC policy

AML and KYC policy is applicable to the Company, its partners and Clients and is intended to hinder and actively prevent money laundering and any other activity facilitating money laundering, financing of terrorism or criminal activity. The company demands from its executives, employees and affiliates to follow the principles of this Policy in order to prevent use of its services for the purposes of money laundering.

The Company determines money laundering as the process by means of which true origin and ownership to the revenues obtained from criminal activity are concealed in such a way that they could be used without any suspicion. It may take many forms, including:

- efforts to transform money received by illegal means into lawfully obtained

money; - making profit from lucrative crime, such as theft, fraud and evasion of

taxes;

- be directly related to any property, money, received by illegal means or connected with terrorist activity;

- investment of revenues obtained from criminal activity into full range of financial products.

The essence of AML and KYC policy includes the necessity to provide the potential clients of the Company with the package of documents containing regulated data on its identity.

This system performs simultaneously several functions. On the one hand, KYC enables the

Company: - to verify identity of the client;

- enables the security service to evaluate the risk of involvement of the client into the illegal activity;

- enables to establish a filter regulating the type and number of transactions for the particular client in order to manage its risks;

- enables to monitor unusual client transactions and, if needed, to initiate their investigation.

- The minimal requirements for identification in order to open new account are listed below. If the client refuses or is unable to provide the required information for opening its account, the account shall be closed:

- official name and any other used names (for example, a maiden name);

- correct permanent address, proved by one of the official documents – utility bill, tax assessment, bank statement. The date of issue of such document shall not exceed 3 months;

- telephone number, fax number and e-mail address;

- date and place of birth;

- nationality;

- profession, job title and/or name of the employer;

- official personal identification number or other unique identifier, contained in the up-to-date official

document (for example, passport, identity card, residence permit, driving license), having the photo of the customer;

- personally signed application.
If the documents of the Client are issued not in English, such documents at the request of the Company shall at first be translated into English by any official translator, and such translated copy shall be duly signed and affixed by this translator and forwarded with other relevant documents and photos of the Client.

The Client undertakes the following obligations within the framework of the AML and KYC policy:

- to uphold legal standards, including international, intended to fight against illegal trade, financial fraud, money laundering and legalization of proceeds, received by illegal means;

- to eliminate direct or indirect aiding illegal financial activity and any other illegal transactions using the Website.

The Client guarantees non-criminal origin, lawful ownership and right to use money transferred by it to the Accounts of the Company.

In case of suspicious or fraudulent money adding, including use of the stolen credit cards and/or any other fraudulent activity (including any repayment or annulments of payments), the Company reserves the right to block the account of the Client and annul any performed payments, as well as to investigate the nature of suspicious transactions on the Account of the Client, and therefore to suspend such transactions till clarification of the reasons of arising thereof and termination of the investigation.

During the investigation, the Company reserves the right to require from the Client the copies of the identity cards and bank card used for deposits, payment, as well as other documents, proving the legal ownership and non-criminal origin of the funds.

The Client is prohibited to use services and/or software for any illegal or fraudulent action, or for any illegal or fraudulent transaction (including money laundering) pursuant to the legislation of the state of the jurisdiction of the Client.

The refusal of the Company to execute suspicious transactions shall not serve the ground for arising of the legal liability of the Company for the failure to fulfil obligations with regard to the Client.

When depositing funds, the name of the sender shall coincide with the name of the client, stated in the account of the Company. In this case third-party mediation shall be prohibited.

The Client may withdraw funds in the same manner by online transfer through the same system of online transfer to the same account, from which they were transferred.

The Company strives to implement strict policy of anti-money laundering in order to guarantee that its clients will be identified as such suspicions to a certain standard in order to minimize the procedural obstacles for actual and legal clients. In order to fulfil its obligation to provide comprehensive assistance to the government, fighting against such illegal financial transactions, the Company has the electronic system, which completely verifies the identity of its client and may maintain the detailed report on all previous financial transactions.

The Company allows monitoring all suspicious actions and timely providing the law enforcement agencies with detailed information. That is why complete legal defence is provided to the clients, who provide the confidential financial data of the Company.

The Company also adheres to compliance with AML and KYC policy in order to fulfil its official legal obligations.

Considering new normative guiding principles, the procedure of due diligence will also include the verification of potential employees on the list of terrorists/individuals/organizations. The role of the employees in realization of any structure of AML is essential, the employees will have to perform effectively the specified procedures. The employees shall keep strict confidentiality regarding KYC and other AML procedures. If any kind of activity is transferred to any agency private person, it will be guaranteed that they follow the principles specified in this Policy.

The Company also ensures regular update of its platform according to current rules and provisions developed to monitor money laundering and other criminal financial practices on site.

Each subdivision of the Company shall apply AML and KYC policy, executed pursuant to the requirements of local legislation.

All personal and service documentation will be kept within minimum period of time, determined by local legislation.

All new employees obligatory undergo training concerning AML and KYC. The existing employees undergo training annually. Participation in additional training programs is obligatory for all employees related to AML and KYC.

Elvix Ltd.