GOLDTRADEZ.APP

Anti-Money Laundering Policy

Procedures for the prevention of money laundering, terrorist financing and other criminal activity in connection with the services provided by GoldTradez.app.

Document version 1.0 · Effective immediately

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1. INTRODUCTION

GoldTradez.app, similarly to the majority of companies providing services on the financial markets, must adhere to principles of Anti-Money Laundering ("AML") and actively prevents any actions that aim or facilitate the process of legalisation of illegally obtained funds. The AML policy ("the Policy") outlines the procedures for preventing the use of the GoldTradez.app services by criminals, with the aim of money laundering, terrorist financing or other criminal activity. For this purpose, a strict policy on the detection, prevention and warning the corresponding bodies of any suspicious activities was introduced by GoldTradez.app.

Moreover, GoldTradez.app has no right to report to Clients that the law enforcement bodies are informed on their activity. Complex electronic system for identifying every GoldTradez.app Client and conducting a detailed history of all operations was introduced as well. To prevent money laundering, GoldTradez.app neither accepts nor pays cash under any circumstances. GoldTradez.app reserves the right to suspend any Client's operation, that can be regarded as illegal or, may be related to money laundering in the opinion of GoldTradez.app staff.

The Policy shall be communicated to all the staff members of GoldTradez.app that manage, monitor or control in any way the customers' transactions and have the responsibility for the application of the practices, measures, procedures and controls that have been determined herein. This Policy also applies to all company officers, appointed contractors, agents, products and services offered by GoldTradez.app. All business units within the company will cooperate to create a cohesive effort in the fight against money laundering.

2. DEFINITION OF MONEY LAUNDERING

Money Laundering is the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments which look legitimate to hide or distort the real source of funds. The process of money laundering can be divided into 3 sequential stages:

> **Placement.** Funds are converted into financial instruments like checks, bank accounts, money transfers or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion, the launderer may make a number of deposits instead of depositing the whole sum at once; this form of placement is called smurfing.

> **Layering.** Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace money being laundered.

> **Integration.** Funds get back into circulation as legitimate to purchase goods and services.

3. GOLDTRADEZ.APP PROCEDURES

GoldTradez.app will make sure that it is dealing with a real person or legal entity. GoldTradez.app also performs all the required measures in accordance with applicable laws and regulations, issued by the relevant supervisory authorities. The AML policy is being fulfilled within GoldTradez.app by means of the following:

- Know Your Customer ("KYC") and Due Diligence
- Monitoring of Client activity
- Record Keeping

GoldTradez.app assesses and evaluates the risks it faces based on the customer's nature, customer's behaviour, customer's initial communication with GoldTradez.app, as well as the risks based on the GoldTradez.app services and securities.

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4. KNOW YOUR CUSTOMER AND DUE DILIGENCE

Due to GoldTradez.app' commitment to the AML and KYC policies, each Client of GoldTradez.app has to complete the verification procedure. Before GoldTradez.app starts any cooperation with the Client, GoldTradez.app must ensure that satisfactory evidence is produced or such other measures are taken to produce satisfactory evidence of the identity of any customer or counterparty. The Company additionally applies heightened scrutiny to Clients who are residents of countries identified by credible sources as having inadequate AML standards or may represent a high risk for crime and corruption and to beneficial owners who reside in and/or whose funds are sourced from named countries.

5. INDIVIDUAL CLIENTS

During the process of registration, each Client provides personal information, specifically: full name, date and place of birth, residential address, phone number and city code. Individual Clients must furnish the following documents (in case documents are written in non-Latin characters, to avoid any delays in the verification process, it is necessary to provide notarized translation of the document into English) because of the requirements of KYC and to confirm the indicated information:

Identity should be verified by: Valid Passport; or National ID Card; or Driver's licence; or any other government-issued identification document. The indicated documents should contain: full name, date of birth, photo of a customer, and also, where applicable: confirmation of the document validity (issue and/or expiry date), holder's signature. The indicated documents must be valid at the time of submission and for at least thirty (30) days from the date of submission.

For the purposes of the provisions relating to identification procedures and CDD requirements, proof of identity is satisfactory if: (i) it is reasonably possible to establish that the customer is the person he claims to be; and (ii) the person who examines the evidence is satisfied, in accordance with the procedures followed under the relevant legislations and regulations, that the customer is actually the person he claims to be.

The current residential address will be verified by one of the followings: a recent utility bill (electricity, water, internet, telephone, gas or any other bill associated with the property from a reliable independent source); or bank statement; or credit card statement; or insurance policy which includes a residential address; or Police Character Certificate; Rental/Lease/Tenancy Agreement; Certificate of Residence or Residence permit, in the case of an individual residing in a country other than his country of birth; or report from the Electoral register confirming the individual resides at a specific address; or Tax Clearance or Tax Returns, which includes the individual's name and address; Valid Passport or National ID Card or Driver's Licence which contains the current residential address and name of the individual; any other government-issued document that contains the individual's current residential address and name.

All the documents prescribed must be current. Whereas, a copy of the above mentioned documents should be apostilled in the country of origin upon GoldTradez.app' request. Both sides of the submitted document are required where applicable (for example, ID or Driver's Licence). The image of the document must be a colour high-resolution photo or scan copy with no blurs, light reflections, or shadows. Four edges of the document should be visible. All information should be clearly readable, free of any watermarks, etc.

For each account GoldTradez.app shall also make reasonable effort, prior to the settlement of the initial transaction, to obtain the following information to the extent it is applicable to the account: occupation of customer; the customer's investment objective and other related information concerning the customer's financial situation and needs; annual income, assets or net worth; any other information deemed necessary for opening an account.

6. CORPORATE CLIENTS

During verification of a legal person, the official provides the following documents because of the requirements of KYC:

- Copies of the Certificate of Registration/Certificate of Incorporation;
- Copies of the Memorandum and Articles of Association, Partnership Agreement or similar, as appropriate;

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- Copies of the By-Laws and latest General Information Sheet, which lists the names of directors/partners and principal stockholders, and secondary licences;
- Extract from Commercial Register, or equivalent document, proving the registration of corporate acts and amendments and current state of the legal person such as Certificate of Good Standing;
- Copy of the Certificate of Incumbency issued not older than 3 months from the filing date;
- Information about the BOs of the company from the independent and reliable sources;
- KYC documents of all Directors, Shareholders, BO's and Officers of the legal person where applicable;
- Appropriate Board of Directors' resolutions and signed application forms for account opening, identifying the authorised signatories or principal officers of the corporation authorised to open an account, to trade and their authorities and specimen signatures;
- Evidence of the registered address and actual place of business of the legal person;
- Latest Audited Financial Statements;
- Where applicable, the Company may also require additional information about the nature of the business of customers such as the description and nature of business (including date of commencement of business, products or services provided, principal place of business).

This procedure is performed to establish the identity of the Client and to help GoldTradez.app know/understand Clients and their financial dealings to be able to provide the best services of online trading.

7. ADDITIONAL PROVISIONS

If, during the business relationship, a customer fails or refuses to submit, within a reasonable timeframe the required verification data and information, GoldTradez.app shall terminate the business relationship and close all the accounts of the customer. Customer due diligence regarding Individual as well as Corporate Clients shall be updated and/or amended soon after any changes take place. This refers to change of residential or business address, new identification cards, new passport, additional business information, new business securities/venture, and the like. For any change of information before the said period the Company requests a letter or document pertaining to the changes being made.

8. MONITORING OF CLIENTS ACTIVITIES

In addition to gathering information from the Clients, GoldTradez.app continues to monitor the activity of every Client to identify and prevent any suspicious transactions or activity. A suspicious transaction or activity is known as a transaction or activity that is inconsistent with the Client's legitimate business or usual Client's transaction or activity history known from the Client activity monitoring or client profile.

GoldTradez.app has implemented the system of monitoring the named transactions or activity (both automatic and, if needed manual) to prevent the use of GoldTradez.app services by criminals. GoldTradez.app reserves the right to suspend any Client's operation, which can be regarded as illegal or, may be related to money laundering in the opinion of the staff. The constant monitoring of the customers' accounts and transactions is an imperative element in the effective control of the risk of Money laundering.

9. DEPOSIT AND WITHDRAWAL REQUIREMENTS

All the Clients' operations to deposit and withdraw funds have the following requirements:

- in case of bank transfer or transfer from the bank card, name, indicated during the registration must match the name of the owner of the account/bank card. It is possible to withdraw funds from the account via bank transfer only in the same bank and the same account which you used for depositing;
- in case of using electronic payment systems, withdraw funds from the trading account is possible only on the system and the account used for depositing;
- if the account was credited in the way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account of the client or any other means may be used, as agreed with GoldTradez.app with the condition that

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GoldTradez.app is able to prove the identity of the account owner;

- if the account has been credited with funds through various payment systems, funds withdrawal shall be made on a pro rata basis commensurate to the size of each deposit. Any profit gained can be transferred to any account from which the deposit arrived as long as such transfer is possible;
- no deposits and withdrawals to the bank accounts, bank cards, electronic money, or any other kind of payment accounts of third parties are allowed.

10. RECORD KEEPING

Records will be kept for all documents obtained for the purpose of customer identification (KYC requirements) and all data of each transaction, as well as other information related to ML in accordance with the applicable AML laws/regulations. The following document retention periods will be followed:

- All documents in opening the accounts of customers and records of all their transactions, especially customer identification records, shall be maintained and safely stored for seven (7) years from the dates of transactions;
- With respect to closed accounts, the records on customer identification, account files and business correspondence, shall be preserved and safely stored for at least seven (7) years from the dates when they were closed.

This Policy applies to all clients, officers, contractors and agents of GoldTradez.app. GoldTradez.app reserves the right to amend this Policy at any time in accordance with applicable laws and regulations.

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