

AML POLICY



Money Laundering – 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 real sources of funds.

The process of money laundering can be divided into 3 sequential stages:

- **Placement**
 - At this stage, funds are converted into financial instruments like checks, bank accounts, and 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 by the company, the launderer may as well 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 their form makes it complicated to trace money being laundered.

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

AML Policy

Vestrado Limited (hereafter referred to as the “Company”, like the majority of companies providing services on the financial market, adheres to principles of



Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalization of illegally gained funds. AML policy means preventing the use of the Company's 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 of the corresponding bodies of any suspicious activities was introduced by the Company. Moreover, the Company has no right to report to Clients that law enforcement bodies are informed of their activity. A complex electronic system for identifying every Company's Client and conducting a detailed history of all operations was introduced as well.

To prevent money laundering, Vestrado neither accepts nor pays cash under any circumstances. The Company 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 staff.

Company's Procedures

The Company will make sure that dealing with a real person or legal entity. The Company also performs all the required measures in accordance with an applicable law and regulations, issued by the monetary authorities. AML policy is being fulfilled within the Company by means of the following:

- Know your Customer Policy and Due Diligence.
- Monitoring of Client activity.
- Record Keeping

Know Your Customer and Due Diligence

Due to the company's commitment to the AML and KYC policies, each Client of the Company has to finish the verification procedure. Before the Company starts any cooperation with the Client, the Company ensures that satisfactory evidence is produced or such other measures are taken as will produce satisfactory evidence of the identity of any customer or counterparty. The Company as well applies heightened scrutiny to Clients, who are residents of the countries, identified by credible sources as countries, having inadequate AML standards or may represent a high risk for crime and corruption, and to



beneficial owners who reside in and whose funds are sourced from named counties.

Individual Clients

During the process of registration, each Client provides personal information, specifically: full name, date of birth, country of residence, and complete address, including phone number and city code. In order to meet the Company's requirements for KYC and identity verification and to confirm the indicated information. Clients who are natural persons should provide the following information upon the Company's request:

- A high-resolution copy of the government-issued identification document, which should contain: full name, date of birth, photo, and citizenship, and also, where applicable: confirmation of the document validity (issue and/or expiry date), and holder's signature. Such identification documents might be a passport, national ID, driver's license, or similar document. The indicated documents must be valid at least 6 months from the filing date. The company reserves the right to request certified copies of the indicated documents and such certification must be valid at least 6 months from the filing date. The company reserves the right to request a second form of the identification document.
- A high-resolution copy of a receipt of utility services payment (gas, water, electricity, or other) or bank statement, containing the full client's name and the actual place of residence. These documents should not be older than 3 months from the date of filling.

When accepting new Clients during the verification process and documents review The Company reserves the right to apply other requirements and procedures for the Client's identification. Such procedures are to be determined at the Company's sole discretion and subject to variations depending on the country of residence of the Client and can include but are not limited to:

- The requirement to verify the bank card used to deposit/withdraw funds;
- The requirement to provide a source of funds, source of wealth, and proof of funds being deposited in a form and manner as the Company finds appropriate;



Corporate Clients

In case the applicant company is listed on a recognized or approved stock exchange or where there is independent evidence to show that the applicant is a wholly owned subsidiary or subsidiary under the control of such a company, no further steps to verify identity will normally be required. In case the company is unquoted and none of the principal directors or shareholders already has an account with the Company, the official provides the following documents because of the requirements of KYC:

- A high-resolution copy of the certificate of incorporation/certificate of registration.
- Extract from Commercial Register, or equivalent document, evidencing the registration of corporate acts and amendments.
- KYC document of all officers, directors, and beneficial owners of the corporate entity.

A high-resolution copy of the Memorandum and Articles of Association or equivalent documents duly recorded with the competent registry.

- Evidence of the company's registered address; and the list of shareholders and directors.
- Description and nature of business (including date of commencement of business, products or services provided, location of principal business).
- This procedure is performed to establish the identity of the Client and to help the Company know/understand the Client and their financial dealings to be able to provide the best services of online trading.

Monitoring of Client Activity

In addition to gathering information from the Client, the Company continues to monitor the activity of every Client to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is inconsistent with the Client's legitimate business or usual Client transaction history known from the Client activity monitoring. The Company has implemented a system of monitoring the named transactions (both automatic and, if needed manual) to prevent using the Company's services to the criminals.



Deposit and Withdrawal Requirements

All the Client's operations to deposit and withdraw funds have the following requirements in case of bank transfer or transfer the bank card, and 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 that you used for depositing.

- In the case of using electronic payment systems, withdrawing funds from the trading account is possible only on the system and the account used for depositing.
- If the account was credited in a way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account of the client or any other way may be used, as agreed with the Company with the help of which the Company 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.

