

# Anti-Money Laundering Policy

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AXIORY group of companies ("Axiory") as the company providing Investment Services to the Client in relation to Financial Instruments, issued this Anti Money Laundering Policy on provision of Investment Services in relation to Financial Instruments ("Anti Money Laundering Policy").

AXIORY group of companies contains Axiory, its subsidiaries, branches, subordinated enterprises or affiliates. To show the importance and willingness to comply with legal requirements and so to help achieve the goals of such, Axiory has adopted within its structure the policies and measures required by the laws of European Union, which are widely known for being highly severe with subject persons performing within its jurisdiction and requiring them to follow very strict rules. Due to these rules and requirements, Axiory group focuses on the following:

- Paying a great attention to each client or partner, especially its background, relevant activities and the verification of identity of every applicant for business and all information provided by such;
- Continuously monitoring the activity of clients, partners and their transactions and making sure that they correspond to our knowledge of clients;
- Creating and safe keeping records on accounts, transactions, communications with clients and partners, gathered information, concerned internal matters and particular procedures;
- Evaluating possible risk of money laundering while dealing with clients and transactions and risk rate our clients.
- Applying enhanced due diligence in case of dealing with suspicious persons, trustees, politically exposed persons, clients from non—reputable jurisdictions and large deposits over the threshold limit;
- Organizing quarterly and annual external trainings for employees, especially for those who deal directly with clients and partners;
- Cooperating with responsible Money Laundering Compliance Officer appointed upon employees of Axiory and approved by the regulatory authorities;
- Monitoring changes to relevant legislation, sanction list, and International Financial Regulators relevant guidance and adopting new measures, if necessary.
- Prohibiting offering any anonymous account or maintaining business relationship with a shell bank.

- Suspicious Transaction Reporting to the competent Authority if deemed suspicious by the Money Laundering Compliance Officer.

Further, in case it happens that Axiory is in any way operating within a jurisdiction, where AML rules require some additional measures, Axiory makes sure to meet all the additional requirements and to treat relevant matters accordingly.

The goal Axiory would like to achieve by adopting a strict AML policy is to prevent itself, its clients, partners, employees, and the industry from being misused for money laundering, terrorist financing or other financial crimes. Axiory is fully aware of possible harmful effects and danger to the global society, which comes together with the possibility for wrongdoers and criminals to disguise criminal origin of property, transfer, acquire or in any way legalize the ownership of such property.

The most significant consequences of Axiory AML policy, that may affect either applicants for business, clients or partners, are following:

- Axiory has developed a specific application through which any applicant has to enter data and upload documents if new account opening is requested. The application safe keeps all data, documents, records on transactions and trades executed by each client.
- While requesting a new account opening, every applicant has to enter detailed personal data including, but not limited to, full name, address, nationality, date and place of birth, ID number and nature of business in case it is a company. During this process (but still before the account is opened) all this data is verified by requesting applicants to upload a copy of their ID card, another proof of identity and proof of residence (plus proof of existence, list of directors and shareholders in case the applicant is a company, and other necessary due diligence documents). Applicant must further fill in an investment questionnaire, where employment and income details, history and experience with investment services are asked about.
- All communication between Axiory and any client or partner concerning financial services provided by Axiory is recorded, regardless of the meaning of communication.

Deposits to be saved on particular account must come from an account opened with authorized credit institution or a credit card, which is owned and held in the name of the particular owner or applicant for opening account with Axiory, otherwise the deposit is rejected. Documents verifying ownership of a card or account are also requested during the account opening process and later on, if necessary.

Withdrawals are normally processed to the same deposit account.

New copies of verification documents are always requested from clients prior to the expiration of the current ones. Clients are obliged to provide new copies of verification documents once they expire.

In case of ongoing monitoring of suspicious activity and high risk, client account and activity will be investigated, and if deemed necessary, reported to relevant authorities