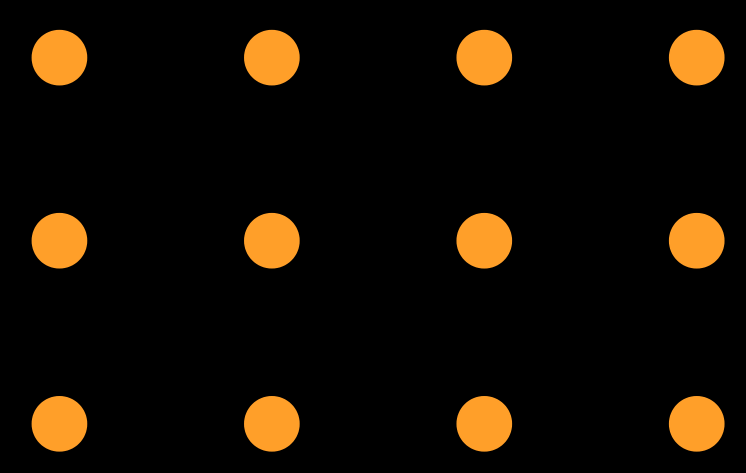




APEX SWAPS

MONEY TALKS



AML AND KYC POLICY

➤ **AML AND KYC POLICY**

The Company, adheres to the principles of Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalizing of illegally gained funds. AML policy means preventing the use of the company's services 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 clients that the law enforcement bodies are informed on 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, the Company neither accepts nor pays cash under any circumstances. The company 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.

➤ **COMPANY'S PROCEDURE**

The Company will make sure that it is dealing with a real person or legal entity. Also performs all the required measures in accordance with applicable law and regulations, issued by monetary authorities. The 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**

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

➤ **INDIVIDUAL CLIENTS**

During the process of registration, each client provides personal information, specifically:

Documents requested at the account opening stage for Individuals

Proof of Identity:

- Passport or in cases where Passport is not available National Identity Card
- Alien Identification Card as another form of ID in case the passport is not available
- Other types of government issued photo ID may be acceptable after review on a case-by-case basis
- Bank Reference or any other Reference from a regulated part (Lawyers, Accountants, Governmental Institution) as an additional document of any other IDs in case the Passport is not available.

The Proof of Identity must:

- Include full name and surname;
- Be currently valid and not older than 10 years;
- Indicate the number, date of expiration, date of birth and country of issue; and
- Be signed by the account holder (where applicable).

Proof of Residence:

- Recent Utility Bill (i.e. electricity, water, telephone, gas) - The bill must be less than three (3) months old. Please note that a mobile phone will be accepted as a valid Proof of Residence only if the name on the bill matches the name of the registration and same for the telephone number.
- Bank Statement - Must be less than three (3) months old.
- Recent Mortgage Statement
- Signed Lease Agreement still within term
- Bank, Investment Letter
- Deed or Other Evidence of Property
- Bill for Homeowner's or Renter's Insurance Policy (less than three (3) months old)
- Security System Bill/Statement (less than three (3) months old)
- Government-Issued Letters or Statements Establishing Current Address and/or P.O. Box (less than three (3) months old)

For example:

- Tax Letters and notices;
- Letters or notices from government housing authorities;
- Jury duty notices;
- Voter registration notices;
- Other official government letters or notices showing customer name and address being verified;

NOTE

that any document that has been used for proof of identity cannot also be used as proof of residence.

NOTE that all documents should be translated.

The proof of residence must:

- Show current address
- Show name as indicated on the account application
- Be from a credible source (with a visible logo)
- Be dated within the last three (3) months

The Following are acceptable as other forms of Proof of Residence for the locals:

- Proof of residence from Municipality, Land registry

The Following are acceptable as other forms of Proof of Residence for non-locals:

- Valid Lease Agreement (one year) between the client and the land lord or between the company which employee is our client and the land lord associated with the contract of employment or a letter from the company declaring our client employment duly signed by the company.

➤ **JOINT ACCOUNT**

Documents Required:

A joint account is made between 2 clients. Both clients should be fully verified in order to proceed with the approval.

Once we receive the internal Joint Account Application Form, we need to check if it is filled and signed by both clients.

- Married couples - Proof of marriage is required
- 1st Degree Family Related - Proof such as birth certificate
- Non-related but having a joint bank account - Joint bank account statement is required and proof of relationship

In most cases, both account holders will submit the documents mentioned above for individuals. If additional documents are required, client will be contacted via email.

➤ **CORPORATE ACCOUNT INFORMATION**

- Certificate of Incorporation
- Certificate of Registered Office
- Memorandum and Articles of Association
- Certificate of Good Standing/ Incumbency
- Certificate of Directors and Secretary
- Certificate of Shareholders
- A resolution of the board of directors for the opening of the account and granting authority to those who will operate it
- Proof of Identification for Shareholder(s)/Director(s)/Secretary/UBO
- Proof of Residence (less than 3 months old) for Shareholder(s)/Director(s)/Secretary/UBO

➤ **MONITORING OF CLIENT ACTIVITY**

In addition to gathering information from the clients, 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 the usual client's transaction history known from client activity monitoring.

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 a bank card, the name, indicated during the registration must match the name of the owner of the account/bank card.
- Withdrawing funds from the trading account via the method, which is different from the depositing method, is possible solely after withdrawing the sum, which is equal to the sum of client's deposits via the method and to the same 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 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.