



ANTI-MONEY LAUNDERING PREVENTION POLICY

Tradestone Ltd. is a Cyprus Investment Firm (hereinafter the “CIF” or “Company”) regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) operating under license number 331/17.

The Company is committed to applying high standards of the Anti-Money Laundering Compliance and Anti-Terrorist Financing by strictly following the requirements of the European Union Directives, the Law and relative Directives of the CySEC.

Money laundering is the process of attempting to conceal the true origin and ownership of the proceeds of criminal activities in an effort to legitimate such funds.

It is accomplished in three stages:

- ✦ Placement – the physical disposal of cash proceeds derived from criminal activity through among others, converting them into financial instruments or bank deposits in a manner that will not raise suspicions;
- ✦ Layering – separating the illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the audit trail and provide anonymity; and
- ✦ Integration – the provision of apparent legitimacy to wealth derived from crime. If the layering process succeeds, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter the financial system appearing as normal business funds.

In accordance with the Law, the Company has set out policies and procedures for preventing money-laundering activities that aim to adhere to the principles of knowing your customer, monitoring the client’s activity and keeping appropriate records.

The most important procedures the company implements in order to achieve these are the following:

- ✦ Identification and due diligence procedures of clients;
- ✦ Record keeping procedures in relation to clients’ identity and their transactions;
- ✦ Internal reporting procedures to a competent person (the AMLCO) appointed to receive and consider information that give rise to knowledge or suspicion that a client is engaged in money laundering activities;
- ✦ Appropriate procedures of internal control, risk management, with the purpose of preventing money-laundering activities;
- ✦ Detailed examination of every transaction that due to its nature is considered vulnerable to money laundering, and especially of complicated or unusually large transactions and transactions that take place without an obvious financial or legal purpose;

- ✦ Measures for making employees aware of the above procedures to prevent money laundering and of the legislation relating to money laundering; and
- ✦ Provision of regular training to employees to help them in the recognition and handling of transactions suspected to be associated with money laundering.

The Company reserves the right to collect and validate proof of identification from its clients prior to account opening and any payments of proceeds.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in:

- ✦ The country of incorporation of the Company, i.e. the Republic of Cyprus;
- ✦ The country of origin of any funds transmitted to the Company; and
- ✦ The destination country of any funds refunded by or withdrawn from the Company.

The Company reserves the right to refuse to process a transfer of funds at any stage if it believes it to be connected in any way to criminal activities or money laundering.

Third party or anonymous payments shall not be accepted. If the Company is not satisfied that you are the sender of the money it reserves the right to reject the money and return it to the remitter less any transfer fees or other charges, the Company further reserves the right to terminate your account held with Us with immediate effect. You may be required to submit additional documentation as required under our Anti-Money Laundering obligations or any similar applicable regulations to Us should an investigation arise and it is at the discretion of the Company to charge a fee of Euro thirty (30) to your account with Us.

The Company is obliged to report all suspicious transactions and is prohibited from informing the client that they have been reported for suspicious account activity. Account misuse may result in criminal prosecution.

The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company may terminate its business relationship with the client either with, or without notice, for a series of severe reasons, deriving from Regulatory Obligations, including taking measures against Money Laundering and extending (but, not limited to) breach of the client agreement and terms and conditions, bad faith, attempt to commit fraud, etc.

The Company reserves the right to review and/or amend its Anti-Money Laundering Prevention Policy at its sole discretion, whenever it deems fit or appropriate.