



Preventing Money Laundering

AML/KYC POLICY



Statement regarding Anti-Money Laundering, Counter Terrorist Financing and Know-Your-Customer measures within Trade kit Ltd

Anti-Money Laundering (AML), Counter Terrorist Financing (CTF) and Know-Your-Customer (KYC) measures are focus areas within trade kit Ltd. Below you will find a summary of our policy in regard to these areas.

The Board of Directors has adopted a Policy and Charter on prevention of money laundering and terrorist financing. It requires trade kit Ltd's head office, branches and subsidiaries worldwide to have effective programs in place to comply with applicable laws, regulations and ethical standards;

The Head of Group Compliance & AML, together with a dedicated team, oversees these policies, practices and procedures. Furthermore, AML Officers within the different business units are obliged to report to the Group Anti-Money Laundering Officer as well as to national Financial Intelligence Units (FIU);

We have implemented procedures and routines regarding Know-Your-Customer and Customer Due Diligence, e.g. identifying customers and beneficial owners and verifying their identity on the basis of documents, data or information obtained from reliable and independent sources. Furthermore, Trade kit Ltd pays special attention to:

- Understanding the ownership and control structure of our customers,
- Obtaining information on the purpose and intended nature of the business relationship, and
- Monitoring the business relationship.

We have established processes enabling us to identify persons and legal entities identified by government agencies to be involved in terrorist financing, money laundering, etc.

We have established processes enabling us to identify persons who qualify to be a PEP or related to a PEP. We have developed procedures that assist in the monitoring of transactions for the purpose of identifying possible suspicious activity;

We have established employee training programs to educate and assist employees in the ways of preventing that Saxo Bank is used to execute transactions related to money laundering and terrorist financing;

Trade kit Ltd does not allow anonymous accounts.

We co-operate with law enforcement and regulatory agencies in accordance with national regulation.

AML/KYC POLICY

Trade kit Ltd Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) is designated to prevent and mitigate possible risks of Trade kit Ltd being involved in any kind of illegal activity.

Both international and local regulations require Trade kit Ltd to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, the proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users.

AML/KYC Policy covers the following matters:

1. Verification procedures
2. Sanctions and PEP lists screening.
3. Compliance Officer.
4. Monitoring Transactions.
5. Risk Assessment.

1. VERIFICATION PROCEDURES

One of the international standards for preventing illegal activity is customer due diligence (“CDD”). According to CDD, Trade kit Ltd establishes its verification procedures within the standards of anti-money laundering and “Know Your Customer” frameworks.

1.1. Identity verification

Trade kit Ltd’s identity verification procedure requires the User to provide Trade kit Ltd with reliable, independent source documents, data or information (e.g., national ID, international passport, bank statement, utility bill). For such purposes, Trade kit Ltd reserves the right to collect User’s identification information for the AML/KYC Policy purposes.

Trade kit Ltd will take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information will be used and Trade kit Ltd reserves the right to investigate certain Users who have been determined to be risky or suspicious. Trade kit Ltd reserves the right to verify User’s identity on an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (unusual for the particular User). Besides, Trade kit Ltd reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

User’s identification information will be collected, stored, shared and protected strictly following the Trade kit Ltd’s Privacy Policy and related regulations.

Once the User’s identity has been verified, Trade kit Ltd can remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

1.2. Card verification

The Users who are intended to use payment cards in connection with the Trade kit Ltd’s Services have to pass card verification following instructions available on the trade kit Ltd’s Site.



2. SANCTIONS AND PEP LISTS SCREENING.

Trade kit Ltd screens applicants against recognised Sanctions and Politically Exposed Persons (PEPs) lists. Individuals and legal entities are screened against mentioned lists:

- * On the onboarding stage when the user is applying;
- * On each anti-fraud and AML alerts manually by Compliance Officer;
- * Monthly by running automatically with a script to re-check all DB of customers.

For the screening process performing Trade kit Ltd uses World Compliance data (provided by LexisNexis) integrated into the proprietary software and supported by World-Check One online search tool (provided by Refinitiv) for manual confirmation.

3. COMPLIANCE OFFICER

The Compliance Officer is the person, duly authorized by Trade kit Ltd, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer's responsibility to supervise all aspects of Trade kit Ltd's anti-money laundering and counter-terrorist financing, including but not limited to:

- a. Collecting Users' identification information.
- b. Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations.
- c. Monitoring transactions and investigating any significant deviations from normal activity.
- d. Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs.
- e. Updating risk assessment regularly.
- f. Providing law enforcement with information as required under the applicable laws and regulations.

The Compliance Officer is entitled to interact with law enforcement, which is involved in the prevention of money laundering, terrorist financing and other illegal activity.

4. MONITORING TRANSACTIONS

The Users are known not only by verifying their identity (who they are) but, more importantly, by analyzing their transactional patterns (what they do). Therefore, Trade kit Ltd relies on data analysis as a risk-assessment and suspicion detection tool. Trade kit Ltd performs a variety of compliance-related tasks, including capturing data, filtering, record-keeping, investigation management, and reporting. System functionalities include:

- 1)** Daily check of Users against recognized "blacklists" (e.g. OFAC), aggregating transfers by multiple data points, placing Users on watch and service denial lists, opening cases for investigation where needed, sending internal communications and filling out statutory reports, if applicable;
- 2)** Case and document management.

Concerning the AML/KYC Policy, Trade kit Ltd will monitor all transactions and it reserves the right to:

- * Ensure that transactions of suspicious nature are reported to the proper law enforcement through the Compliance Officer;

- * Request the User to provide any additional information and documents in case of suspicious transactions;

- * Suspend or terminate User's Account when Trade kit Ltd has reasonable suspicion that such User engaged in illegal activity.

The above list is not exhaustive and the Compliance Officer will monitor Users' transactions on a day-to-day basis to define whether such transactions are to be reported and treated as suspicious or are to be treated as bona fide.

5. RISK ASSESSMENT

Trade kit Ltd, in line with the international requirements, has adopted a risk-based approach to combating money laundering and terrorist financing. By adopting a risk-based approach, Trade kit Ltd can ensure that measures to prevent or mitigate money laundering and terrorist financing are commensurate to the identified risks. This will allow resources to be allocated in the most efficient ways. The principle is that resources should be directed following priorities so that the greatest risks receive the highest attention.