

Measures to combat illicit financial transactions

Open Finance adheres to a strict policy to prevent money laundering. These policies include the following measures:

- 1) Requiring customers to provide authentic documents containing their personal information.
- 2) Screening customers for any connections to known or suspected terrorists by comparing their names against relevant lists.
- 3) Informing customers that the provided information may be used for identity verification purposes.
- 4) Exercising careful control over customer financial transactions. Cash payments, money transfers, transactions from third parties, currency exchange transactions, or Western Union transfers are not accepted.

Concept of money laundering.

Money laundering is the process of concealing unlawfully obtained funds in such a way that they appear to originate from legitimate sources. We strictly adhere to the legislation that prohibits us, as well as our employees or agents, from knowingly participating in or undertaking any actions related to money laundering. Our anti-money laundering policy is aimed at strengthening the protection of investors' interests and client security, as well as ensuring secure payment processes.

The process of income legalization typically goes through three stages:

- 1) Initially, it is necessary to deposit funds or their equivalents into the financial system.
- 2) In the second stage, financial operations are conducted to move the funds to other accounts (e.g., futures accounts) in order to obscure their origin. This may involve low or nonexistent financial risk operations and the transfer of remaining funds from one account to another.
- 3) Subsequently, the money is reintroduced into the economy in a manner that makes their source appear legitimate. For example, closing the futures account and transferring the funds to a bank account.

Trading accounts can be used for laundering unlawfully obtained funds or concealing their origin, as well as ensuring the account owner's anonymity.

To prevent potential abuses, we will carry out the return of funds to their initial source.

International efforts to combat money laundering require financial institutions to be aware of potential abuses associated with the use of trading accounts and take measures to detect and report potential suspicious activities. These rules have been established to protect clients.

What is Anti-Money Laundering (AML)?

Anti-Money Laundering (AML) is a term primarily used in the financial and legal sectors to describe the legal measures aimed at controlling the activities of financial institutions and other regulated entities in order to detect and prevent illicit money laundering activities.

We consider money laundering as illegal actions and take a leading position in combating criminal activity. We maintain constant communication with responsible industry regulatory authorities and closely monitor developments, especially concerning the owners of our accounts.

Protection against money laundering begins with client identification through the "Know Your Customer" (KYC) verification process. To comply with AML standards, our company requests the following documents from the client:

- 1) Proof of identity: a copy of the front and back sides of a valid passport or driver's license.
- 2) Proof of address: an official document issued no more than 3 months ago, indicating the name and address. This can be a utility bill or bank statement.
- 3) Copy of the front and back sides of the bank card used for the transaction: for security and confidentiality, we only request to see the last 4 digits of the card. Additionally, the client may conceal the CVV code.
- 4) Deposit declaration.

It is important to note that norms and standards may vary in different countries, so we may need to provide additional documentation.

Control

We only accept deposits in your name and only after verifying KYC documents. According to our AML policy, all funds must be returned to the source from which they were received. This means that if you used a bank transfer for the deposit, funds can only be withdrawn to the same account. Similarly, if you used a credit card, the funds will be refunded to that card.

Please note that we do not accept cash deposits and do not provide cash withdrawals.

Reporting Preparation

To comply with AML requirements, we must monitor suspicious transactions and report them to the appropriate law enforcement agencies. We reserve the right to refuse a transfer at any stage if we believe it may be associated with criminal activity or money laundering. The law prohibits us from notifying clients about messages sent to law enforcement agencies regarding suspicious activity.

If you have any questions, comments, or need further clarification, please contact us.