

## **Anti - Money Laundering and Counter - Terrorism Financing Policy**

### **1. General Terms**

- 1.1. Anti - Money Laundering and Counter - Terrorism Financing Policy (hereafter – AML/CTF Policy) is a constituent and integral part of the Customer Agreement.
- 1.2. Fort Financial Services LTD (hereafter – the Company) strictly complies with the existing international legislation in the sphere of anti - money laundering and counter - terrorism financing.
- 1.3. As part of this AML/CTF Policy, the Company has established the “Know-Your-Customer” Policy that consists of constant analysis and monitoring of the Company’s customer and his trading accounts transactions.
- 1.4. As part of this AML/CTF Policy, the Company has established the Refund Policy.
- 1.5. Main objectives of AML/CTF Policy are:
  - establishment of the sustainable principles of AML/CTF Policy and their responsible fulfillment thereof to ensure timely disclose of the customers’ criminal transactions on the trading accounts therefore (hence) reducing the influence on the compliant customers;
  - ensuring the protection of business reputation of the Company;
  - elimination of the involvement and participation of the Company’s employees in money laundering and terrorism financing.
- 1.6. This AML/CTF Policy stipulates the general rules of the internal customer control and is binding for all employees of the Company.

### **2. General Principles of Anti - Money Laundering and Counter - Terrorism Financing Policy**

- 2.1. The Company does not open a trading account on an anonymous basis.
- 2.2. The Company has the right to block the access to Trader’s Room, suspend the trading activities on the accounts, cancel deposit/withdrawal requests, if in the course of collaboration with the Company any information is discovered that the Customer ( for legal entities – the owner or director) is being involved in extremism, criminal activity or money laundering.
- 2.3. The Company shall under no circumstances accept cash as a deposit from the customers or pay cash to the customers.
- 2.4. Each customer of the Company shall use his/her personal e-wallet only for depositing/withdrawing of the funds. Thereby, the name of the e-wallet holder shall fully correspond to the name specified at the Customer’s registration form on the Company’s web-site.
- 2.5. Usage of the same payment accounts by different customers of the Company is (strictly) prohibited.
- 2.6. Each customer of the Company must verify his/her e-wallet payment details in his/her Trader’s Room, to be able to use them for performing (to perform) deposit and withdrawal transactions.
- 2.7. In case any doubt arises regarding the validity and relevance of the Customer’s payment details, the Company has the right to request a screenshot of the payment system page that contains information about its (this e-wallet) holder.
- 2.8. Internal transfer of the funds between the accounts within the Company may be performed by the verified Customer only. Funds transfer between the accounts/Trader’s rooms belonged to

different Customers of the Company is prohibited.

- 2.9. Funds may be withdrawn only by the same way and using the same payment account (details), via which such funds have been deposited to the account, unless otherwise is stipulated by the Company's regulations.
- 2.10. The Company shall carry out mandatory customer verification according to the Customer Agreement and in conformity with the principles of the "Know-Your-Customer" Policy.

### **3. Furnishing of information to Authorized Authority**

- 3.1. In case of detection of any suspicious activity carried out by the Customer on his/her trading accounts, Company's employee must inform and provide all the necessary documents to the Compliance Manager.
- 3.2. Each employee of the Company shall inform the Compliance Manager of any suspicious proposals made by customers even if the transactions don't take place.
- 3.3. All the actions taken in relation to the transactions to be communicated to the authorized authority shall be documented and kept in compliance with the established requirements of confidential information protection.
- 3.4. Details of the transactions to be communicated to the authorized authority and any contacts with the authorized authorities regarding such transactions shall be documented.

### **4. Confidentiality**

- 4.1. Information about the customers and their transactions obtained according to the AML/CTF Principles is confidential.
- 4.2. The Company employees and the Compliance Manager shall not be entitled to inform the customers or other persons of forms, methods and implementation ways of the AML/CTF Policy.
- 4.3. Disclosure to other persons of any information that the Company has furnished to the authorized authority and any data concerning the customer's transactions or activities shall be strictly prohibited.

### **5. Documents and Information Storage**

- 5.1. Data obtained as a result of the customer identification and information about the transactions shall be kept as the evidence of measures taken by the Company in accordance with the applicable AML/CTF Policy, in order to be used as the evidence in the course of investigations held by authorized authorities.
- 5.2. Customers' ID information shall be kept for at least five years after the termination of business relations with the customer according to the applicable "Know-Your-Customer" Policy.
- 5.3. Data on the transactions communicated to authorized authority shall be kept for at least five years after the transaction date.
- 5.4. All internal and external reports furnished as part of implementation of the AML/CTF Policy shall be kept for at least five years after the report submission.
- 5.5. The Company is obligated to keep information about all its actions taken to fulfill the requirements to collect from employees, and transfer to the authorized authority about detected transactions. If it is decided not transfer the information about suspected money laundering/counter-terrorism financing to the authorized authority, information concerning such facts shall also be subject to keeping.