

## **AML and KYC policy**

### Anti-money laundering and know your client policy

AML and KYC policy spreads on [www.grandcapital.ru](http://www.grandcapital.ru), under the control of GrandCapital Ltd, Suite 305, Griffith Corporate Centre, P.O. Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines and its partners and clients (hereinafter the «Company») and has the purpose of obstructing and active prevention of money laundering and any activity that facilitates money laundering or funding terrorist or criminal activities. The company demands the managers, employees and affiliates to follow the principles of this Policy in order to prevent the use of their services for money laundering.

The object of this Policy, as a rule, are the actions aimed at concealing or disguising the true origin of the funds obtained by criminal means, for the purpose of money laundering.

Usually, money laundering occurs in three stages. Firstly, at the stage of «placement», the cash enters into the financial system, where the money obtained through criminal actions, are converted into monetary instruments, such as money orders, traveler's checks or come to the accounts of financial institutions. At the stage of «bundles» the funds are transferred or moved to other accounts or other financial institutions for further separation the money from its criminal origin. At the stage of «integration» the money are back into the economy and used to purchase property, business or criminal activity financing. While financing terrorism the funds are not obligatory criminal; most likely it is an attempt to conceal the origin or intended use of funds, which will later be used for criminal purposes.

The company undertakes to provide all necessary information about the clients at the request of law enforcement agencies and other authorized financial institutions, as well as to keep records about the veracity of the mentioned entities - clients, their accounts, the date of opening and closing of accounts and transactions.

For the purposes of identification and prevention of terrorism or other types of crimes, the Company agrees to exchange with financial institutions or law enforcement agencies any information on suspected terrorists, or money laundering.

The Client undertakes to:

- to comply with legal norms, including international ones, aimed to struggle illicit trafficking, financial fraud, money laundering and legalization of funds obtained by illegal means;
- eliminate direct or indirect complicity in illegal financial activities and any other illegal transactions with the use of the Site.

The Client guarantees the legal origin, legal ownership and the right to use the funds transferred to the company's accounts.

In case of suspicious or fraudulent fund completions, including the use of stolen credit cards and / or any other activity of fraudulent nature (including any refunds or cancellation of payments), the Company reserves the right to block your account and cancel any executed payment, as well as to investigate the nature of doubtful operations on the Client's Account, thereby to suspend such operations until the reasons of their occurrence and the end of the investigation.

If the origin of client funds is suspect and / or the means of a data sender and owner of a trading account are different, the company reserves the right to block the account of the client until the results of the investigation by Company Security Service. The withdrawals from a trading account by the Client can be done after a complete verification of client's data: a completed application form, verified contact details, and provided copies of documents on demand of the Company.

The withdrawal of funds from the trading account of the client is carried out only to the owner's details of the trading account. Internal transfers between company's clients are prohibited, as well as withdrawal of funds to third parties.

The company has the right to request additional information about the client, if the input method and the method of funds withdrawal are different. The company also reserves the right to block the client's account during the investigation, if the client refused to provide the additional information requested from him by the Company.

During the investigation the Company reserves the right to request a copy of the Client ID and bank card used for the replenishment of the account, payment and other documents confirming the lawful possession and legal origin of funds.

It is forbidden for the Client to use the services and / or the software for any illegal or fraudulent activities, or for any unlawful or fraudulent transaction (including money laundering) under the laws of client's country of jurisdiction. The denial of the Company to executed suspicious transactions is not the reason for the civil liability of the Company for failure to fulfill obligations to the Client.

Each division of the Company shall be guided by the policies of AML and KYC, prepared in accordance with local regulations.

All personal and official documents will be retained for a minimum period of time set by local law. All new employees are required to attend AML and KYC training.

Existing employees undergo annual training. Participation in additional training programs is mandatory for all employees related to AML and KYC.