

2019.03.18

## **Statement regarding Anti-Money Laundering, Counter Terrorist Financing and Know-Your-Customer measures**

**Anti-Money Laundering (AML), Counter Terrorist Financing (CTF) and Know-Your-Customer (KYC) measures are focus areas of our Company.**

**Below you will find a summary of our policy in regard to these areas.**

The Board of Directors has adopted an Internal Policy Document on prevention of money laundering and terrorist financing. It requires Just2Trade Online Ltd ('Company') to have effective programs in place to comply with applicable laws and regulations;

The Company's Anti-Money Laundering Compliance Officer oversees these policies, practices and procedures. Furthermore all Company employees are obliged to report to the Anti-Money Laundering Compliance Officer any suspicious activity or transactions;

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, Just2Trade Online 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. (e.g. EU's, HMT's and OFAC's sanction lists);

We have established processes enabling us to identify persons who qualify to be a PEP (Politically Exposed Person) 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 the Company is used to execute transactions related to money laundering and terrorist financing;

The Company does not allow anonymous accounts.

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