



ANTI-MONEY LAUNDERING POLICY

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TABLE OF CONTENTS

1. INTRODUCTION	3
2. Tradeopol AML POLICY	3
3. ACCOUNT OPENING PROCEDURES - KNOW YOUR CUSTOMER POLICY (“KYC”)	4
4. BANK ACCOUNT REQUIREMENTS	5
5. FUNDS WITHDRAWAL PROCEDURE	5
6. COMPLIANCE FOOTNOTE	6

1. INTRODUCTION

GRADIAN LTD (hereinafter referred to as 'Tradeopol' or the 'Company') is Gradian LTD. Registration No. 118640 with registered address at Trust Company Complex, Ajeltake Island, Majuro, Marshall Island MH96960.

Additionally, Tradeopol carries out its activities in line with the Financial Intelligence Centre Act, 2001 (Act No. 38 of 2001) as amended by the Protection of Constitutional Democracy against Terrorist and Related Activities Act, 2004 (Act No. 33 of 2004), the Financial Intelligence Centre Amendment Act, 2008 (Act No. 11 of 2008), the General Intelligence Laws Amendment Act, 2013 (Act No. 11 of 2013), the Financial Intelligence Centre Amendment Act, 2017 (Act No. 1 of 2017) and the Financial Sector Regulation Act, 2017 (Act No. 9 of 2017). Tradeopol also follows the Financing Control Regulations, under Money Laundering and Terrorist Financing Control Regulations, 2002, published in Government Notice No. R. 1595 of 20

December 2002 as amended by GN R456 in Government Gazette 27580 of 20 May 2005 and GN R867 in Government Gazette 33596 of 1 October 2010 and GN 1107 in Government Gazette 33781 of 26 November 2010 and GN R.1062 in Government Gazette 41154 of 29 September 2017. The Minister of Finance has, in terms of section 77 of the Financial Intelligence Centre Act, 2001 (Act No. 38 of 2001), made the regulations set out in the Schedule. Furthermore, Tradeopol is operating in line with the FATF Recommendations.

The “Financial Action Task Force” (“FATF”) set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system.

Starting with its own members, the FATF monitors countries' progress in implementing the FATF Recommendations; reviews money laundering and terrorist financing techniques and counter-measures; and, promotes the adoption and implementation of the FATF Recommendations globally.

2. Tradeopol AML POLICY

At Tradeopol we are devoted to preventing money laundering activities and identifying suspicious transactions, therefore we have implemented the following measures in order to comply with our regulatory requirements:

- Verifying our client's identity and place of residence;
- The nature of the client's business;
- The intended purpose of the business relationship concerned and the source of the funds which the client expects to use.
- Identifying, monitoring and reporting any kind of suspicious transactions.

- Keeping documents and records for at least 5 years after the termination of the business relationship with our clients.
- Continuous training of our staff to recognize suspicious transactions, fulfill all reporting obligations and keep up to date with the AML legal requirement.
- Depending on client location, report any suspicious activities to authorities in several countries.

In addition to the above mentioned Tradeopol:

- Collects, verifies and updates annually the personal identification information of all account holders.
- Tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.
- Does not accept deposits from 3rd parties nor cash deposits or disbursements under any circumstances.
- Matches each deposit to the account name held on file for that customer.

- Monitors funding from bank accounts held outside the account holder's home country.
- Reserves the right to refuse to process a transaction where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, Tradeopol is under no obligation to inform the client when suspicious activity is reported to any corresponding regulatory or legal bodies.

! All Tradeopol client funds are held in separate, segregated accounts that are designated solely for client deposits and withdrawals.

3. ACCOUNT OPENING PROCEDURES - KNOW YOUR CUSTOMER POLICY (“KYC”)

Account Opening Requirements

In order to open a trading account with Tradeopol, the potential client must have a permanent residence in a country not within the European Economic Area (EEA) and be over 18 years old. In addition, the steps listed below must be followed:

- complete the account opening application, which includes providing personal information (name, date of birth, etc), information relating to his/her economic profile (annual income, estimated net worth, employment status, etc.)
- complete the appropriate test
- provide identification documents which consist of a valid form of government-issued identification and a proof of residence

! Please note that from the day of receiving the account opening application a timeframe of 1 month is given to provide the required information and documentation. If the potential client fails to provide these within the aforementioned timeframe, the Company will decline the application and in case of any deposits, will refund the available balance back to the method used to deposit the funds.

Identification Documents:

1. Proof of Identity

Following documents are accepted as a Proof of Identity:

- A valid Passport
- A valid National Identity Card
- A valid government ID, such as a Driver's License
- A valid Residence Permit

The document must be issued on your name and all information on the document including your photo must be visible.

! Please keep in mind that your Proof of Identity must be updated once the document expires.

! All photo IDs are verified through a third-party compliance software.

The Company reserves the right to ask for certified true copies of the above mentioned documents.

2. Proof of Residence

Following documents are accepted as a Proof of Residence:

- A utility or phone bill
- A bank statements
- Governmental documents such as tax bill or residence certificate (stamped)

Please note that your proof of residence document must be recent (not older than 6 months), show your name, permanent address and date of issue.

! Please keep in mind that your Proof of Residence must be updated at least once per year.

The Company reserves the right to ask for certified true copies of the abovementioned documents.

Additionally, the company reserves the right to request additional documents from its clients whenever it deems necessary.

4. BANK ACCOUNT REQUIREMENTS

Tradeopol account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

5. FUNDS WITHDRAWAL PROCEDURE

The withdrawal procedure at Tradeopol detailed below follows strict principles to ensure that the funds are sent back to their originating source.

- a. Tradeopol customers must complete a signed paper or digital withdrawal request containing their correct account information.
- b. The withdrawal form must be submitted to the Tradeopol Finance department for processing. The Finance department will do the following:
 - confirm the account balance
 - confirm that the account is approved and the provided documents are up-to-date.
 - verify that there are no holds or withdrawal restrictions on the account
 - verify that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file

- examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity
 - verify the bank account details held on file
- c. If there is no mismatch or suspicious activity the Finance Department will approve the withdrawal, and the funds are released to the client.
 - d. In the event that the Finance Department believes there was suspicious activity on the account, the Tradeopol Anti-Money Laundering Compliance Officer (AMLCO) will be informed, in order to perform further investigation.
 - e. If the withdrawal will be flagged for suspicious activity by the Tradeopol AMLCO, the withdrawal is placed on hold, and sent to the Tradeopol Management.
 - f. Tradeopol Management along with the Tradeopol AMLCO will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

! Please note that your trading account must be verified in order for the withdrawal to be processed.

6. COMPLIANCE FOOTNOTE

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the Tradeopol Compliance Team. A detailed copy of our Compliance Policy is available for qualified institutions, regulatory bodies and related counterparties.

No substitutions or modifications will be accepted to the requirements above. The Tradeopol Compliance Department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in

- a. the country of incorporation of the Company, i.e. Marshall Islands;
- b. the country of origin of any funds transmitted to Tradeopol.
- c. the destination country of any funds refunded by or withdrawn from the Company.

Tradeopol does not wish to enter into a business relationship if the funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Anti Money Laundering Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy only but is not part of our Terms and Conditions of Business and is not intended to be contractually binding.

For additional questions concerning Tradeopol policies, please contact our Compliance Department:

Email: compliance@Tradeopol.com

Attn. Compliance Department

Gradian LTD. Registration No. 118640 with registered address at Trust Company Complex, Ajeltake Island, Majuro, Marshall Island MH96960.

Website: www.Tradeopol.com

