



HERZEN INTERNATIONAL CORPORATION (IO3468)

AML POLICY

Herzen International is committed to the highest standards of the Anti-Money Laundering (AML) compliance and Counter-Terrorism Financing (CTF). To help the government fight the funding of terrorism and money laundering activities, law requires all financial institutions to obtain, verify, and record information that identifies each person opening an account.

1. Money laundering

The process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments that look legitimate to hide or distort the real source of funds.

The process of money laundering can be divided into three sequential stages:

i. **Placement**

At this stage, funds are converted into financial instruments, such as cheque, bank accounts and money transfers, or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make several deposits instead of depositing the whole sum at once, this form of placement is called smurfing.

ii. **Layering**

Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transaction. Moving funds around and changing in their form makes it complicated to trace the money being laundered.

iii. **Integration**

Funds get back into circulation as legitimate to purchase goods and services. Herzen International adheres to the principles of Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalizing of illegally gained funds. AML policy means preventing the use of the company's service by criminals, with the aim of money laundering, terrorist financing or other criminal activity.

To prevent money laundering, Herzen International neither accepts nor pays cash under any circumstances. The company reserves the right to suspend any user's operation, which can be regarded as illegal or, may be related to money laundering in the opinion of the staff.

2. Company Procedures

Herzen International will make sure that it is dealing with a real person or legal entity. Herzen International also performs all the required measures in accordance with applicable law and regulations, issued by monetary authorities. The AML policy is being fulfilled within Herzen International by means of the following:

- a. Know your customer policy and due diligence
- b. Monitoring of client activity
- c. Record keeping



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3. Know Your Customer and Due Diligence

Because of the company's commitment to the AML and KYC policies, each client of the company must finish a verification procedure. Before Herzen International starts any cooperation with the user, the company ensures that satisfactory evidence is produced or such other measures that will produce satisfactory evidence of the identity of any customer or counterparty are taken. The company as well applies heightened scrutiny to clients, who are residents of other countries, identified by credible sources as countries, having inadequate AML standards or that may represent a high risk for crime and corruption and to beneficial owners who resides in and whose funds are sourced from named countries.

4. Individual users

During the process of registration, each user provides personal information, specifically: full name; date of birth; country of origin; and complete residential address.

The following documents are required to verify the personal information:

- i. National identify card (showing both front and back pages); or
- ii. Current valid passport (showing the first page of the local or international passport, where the photo and the signature are clearly visible); and
- iii. Driving licence which bears a photograph; and
- iv. Documents proving current permanent address (such as utility bills, bank statements, etc.)

Containing the user's full name and place of residence. These documents should not be older than 3 months from the date of filing.

5. Corporate users

Company is required to provide the following documentations, nor the applicant company is listed on a recognised or approved stock exchange or when there is independent evidence to show that the applicant is a wholly owned subsidiary or a subsidiary under the control such a company, verification identity will be required;

- i. Certificate of incorporation or any national equivalent;
- ii. Memorandum and Articles of Association and statutory statement or any national equivalent (except companies act 2016)
- iii. Certificate of good standing or other proof of registered address of the company;
- iv. Resolutions of the board of directors to open an account and confer authority on those who will operate it;
- v. Copies of powers of attorney or other authorities given by the directors in relation to the company;
- vi. Proof of identity of directors in case he/she will deal with Herzen International on behalf of the Customer (according to the Individual identity verification rules described above);
- vii. Proof of identity of the beneficial owner(s) and/or the person(s) on whose instruction the signatories on the account are empowered to act (according to the Individual identity verification rules described above).



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6. Monitoring of user's activity

In addition to gathering information from the users, Herzen International continues to monitor the activity of every user to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is inconsistent with the user's legitimate business or the usual user's transaction history known from user activity monitoring. Herzen International has implemented the system of monitoring the named transaction (both automatic and, if needed, manual) to prevent using the company's service by criminals.

7. Record keeping

Records must be kept of all transaction data and data obtained for the purpose of identification, as well as of all documents related to money laundering topics (e.g. files on suspicious activity reports, documentation of AML account monitoring, etc.). Those records are kept for a minimum of 7 years after the account is inactive.

8. Deposit and withdrawal requirements

All deposit and withdrawals on trading account held with Herzen International the following strict requirements:

- i. Due to AML/CTF laws, Herzen International cannot receive or deposit funds to third parties.
- ii. Funds deposit to Herzen International's custodian bank must be from a bank account, Credit/Debit card or Alternative Payment Method (Skrill, China Union Pay, Neteller, Fasapay or others payment gateway provided by Herzen International) under the same name as the trading account name with Herzen International .
- iii. All withdrawal request are processed on First-In-First-Out(FIFO) basic according to the funding source of organisation. For example, a deposit is made via Debit/Credit Card; then a subsequent withdrawal request is received. The amount of funds sent back to the relevant Debit/Credit Card, when a withdrawal request is received, may not exceed the original amount deposited from same. Any profits made in excess of the deposited amount will be transferred to a nominated bank account; which must be held in the same name as your trading account.
- iv. Examples:
 - a. You deposited \$100 via Credit Card and earned a profit of \$1,000. Requesting a withdrawal of \$1,000, you will get \$100 to your Credit Card and the rest \$900 to your bank account.
 - b. You deposited \$100 via Skrill and \$50 via Credit Card. Requesting a withdrawal of \$120, you will get \$100 to Skrill and \$ 20 to the card
 1. All initial withdrawal request must be verified for safety and security by provision of a bank statement; which includes account holder information and bank details. Herzen International will not accept deposits or withdrawals made under a different name to the registered account in Herzen International.



HERZEN INTERNATIONAL CORPORATION (IO3468)

2. If a trading account was credited in a way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account under the same name as the trading account name with Herzen International as long as the user provides satisfactory evidence of the ownership of bank account where the funds originated from as well as the destination bank account.

9. Measures taken

In cases of an attempt to execute transactions which Herzen International suspects that are related to money laundering or other criminal activity, it will proceed in accordance with the applicable law and report suspicious activity to regulating authority.

HERZEN INTERNATIONAL RESERVES THE RIGHT TO SUSPEND ANY USER'S OPERATION, WHICH CAN BE REGARDED AS ILLEGAL OR MAY BE RELATED TO MONEY LAUNDERING IN THE OPINION OF THE STAFF. HERZEN INTERNATIONAL HAS COMPLETE DISCRETION TO TEMPORARILY BLOCK THE SUSPICIOUS USER ACCOUNT OR TERMINATE AN EXISTING USER RELATIONSHIP.

CUSTOMER HEREBY CONFIRMS TO HAVE RECEIVED, READ AND UNDERSTOOD ALL THE ABOVE AML POLICY AND AGREES TO BE BOUND BY THEM.