

## Broker's Anti Money Laundering Policy

Esplanade Market Solutions does not accept legitimization of illegally obtained funds and supports the battle against individuals involved in illegal money laundering and financing terrorism.

Esplanade Market Solutions commits to stand by AML policies and policies against financing terrorism. In order to help government authorities in their AML policies and policies against financing terrorism, all financial organizations are obliged to collect, check and store data identifying the account holder. For this purpose, Esplanade Market Solutions has designed an internal AML policy to battle financing terrorism and legalization of criminally obtained funds.

According to acting legislature and in order to confirm that its business is not being used towards money laundering or financing terrorism, Esplanade Market Solutions is taking the following actions:

- Identification and due diligence in client checks
- Processing identification data
- Internal control, risk evaluation and risk management aimed at preventing money laundering and financing terrorism
- Close attention to each transaction which can by its nature be considered especially vulnerable and be associated with money laundering or financing terrorism and in particular to especially complicated and especially large transactions and all other unusual transaction schemes that do not possess any evident economical or legal purpose
- Informing employees about legislature and internal AML policies in Esplanade Market Solutions
- Continuous education for employees and representatives in order for them to receive skills to identify and manage the transactions that could potentially be linked to money laundering or financing terrorism.

It should be understood that Esplanade Market Solutions should not be asked to (and Esplanade Market Solutions may not be able to due to current regulations) accept a private person or legal entity as its Client until it receives the entire volume of required documentation which is duly and properly completed by that person or entity and the documentation goes through the required checking process (including Client's identification for AML policies and good standing checks).

Opening an account with Esplanade Market Solutions, Client assumes the following responsibilities:

- Client shall abide by all acting AML policies
- Client confirms that they do not possess any information or suspicion that the funds deposited to the account previously, currently or in the future may have been obtained illegally or are related to money laundering or any other illegal activity banned by acting legislature or instructions of international organizations
- Client confirms that they do not possess any information or suspicion that the profit received from investment activity will be used towards financing illegal activities

- Client agrees to immediately provide any information Esplanade Market Solutions may require to comply with the current legislature and regulating the demands regarding AML policies.

Broker shall conduct primary and on-going identification checks for Clients according to the potential risk level concerning each client. Broker shall demand minimal information from each client confirming their identification and shall store this information together with means and results of these checks. Esplanade Market Solutions singlehandedly and/or through Client Support Center shall inform Client of any mismatch or suspicions discovered during Client identification.

Mandatory set of identification data includes:

1. Client's full name
2. Client's date of birth
3. Client's nationality
4. Client's identification number
5. Client's permanent address
6. Client's professional field

To verify the aforementioned data, Esplanade Market Solutions requires the following documents, including but not limited to:

- Client's active passport/identification card
- Client's national identity (driver's license etc.)
- Document, confirming client's current permanent residency (utility bill, bank statement, etc.)
- Incorporation documents required to start a legal entity in a given country (for legal entities and sole proprietors).

Also, it is assumed that Esplanade Market Solutions reserves the right to introduce additional requirements for funds origin clarification prior to accepting as a Client a person or a group of persons, including those residing in certain countries with an increased risk of money laundering.

During the Client identification process and funds origin check, Esplanade Market Solutions relies on a number of identification algorithms including the one where Client may be required to go through a photo identification process. In these cases a designated third party must verify this information.

Esplanade Market Solutions also does not accept cash, third party transactions, transfers from currency exchange offices or Western Union transfers and alike. Esplanade Market Solutions reserves the right to refuse any deposits coming from the accounts not related to Client or funds withdrawal by a third party.

Esplanade Market Solutions is entitled to notify the appropriate state and other related authorities about identified cases of illegal or inappropriate usage of internal transfers.

Complying with these demands is essential for protection of Esplanade Market Solutions and its clients. In case of questions/comments about these demands please contact: info@esplanade-ms.com.