

## Know Your Client Policy

1. Know Your Client Policy (hereinafter referred to as KYC) is an integral part of the Client Agreement.
2. Esplanade Market Solutions policy establishes the general principles of Client identification (for private persons) or their representatives (for legal entities). KYC Policy is applied both before the company started to provide services for Client and during the process of providing services.
3. KYC Policy aims at establishing criteria for Broker to perform Client identification (for private persons) or their representatives (for legal entities) both before the company started to provide services for Client and during the process of providing services. The main aim is to avoid providing services to persons involved in illegal money laundering or financing terrorism, leading to reputational, financial or legal risks for Broker or its agents and partners.
4. KYC Policy is designed in accordance with the norms of international legislature for preventing criminal activity, illegal money laundering and financing terrorism. KYC Policy establishes minimal standards that Broker must comply with according to international regulations.
5. In accordance with KYC Policy, Broker not only aims to collect proof of identity of acting and/or potential clients and legal nature of their plans and goals but also seeks proof that their activity is legal and does not interfere with international regulations battling illegal money laundering or financing terrorism.
6. Persons wishing to become Client of Broker at the moment of verification in Trader's Room must provide:

### FOR PRIVATE PERSONS:

- Copy of their principal identification document containing a photo and registration address (issued by the government of person's jurisdiction)
- Additional document confirming Client's registration address (bank statement, utilities bill or any other service bill made in Client's name at least 3 months prior to Trader's Room registration)

### FOR LEGAL ENTITIES:

- Copy of registration certificate in high resolution
- Copy of articles of association
- Confirmation of director or representative's authority
- Document stating the official registered address of the company
- Copies of identification documents of all directors and shareholders

All necessary documents must be uploaded through the Trader's Room.

7. Broker does not open accounts for anonymous clients. Broker is entitled to blocking/halting all trading activity on accounts/deny funds transfer in case:

- Client provides falsified identification documents
- Obtaining information that Client (for legal entities information regarding owners, directors and/or official representatives) is involved with extremist activities or activities connected to illegal money laundering

8. Broker monitors Client's operations on a regular basis in order to timely identify conspicuous operations as well as operations that are subject to mandatory control.

9. At any time during service provision, Esplanade Market Solutions is at their discretion entitled to demand Client provides any documents to restore the functionality of the account or confirm any other actions (or operations) both completed and those about to take place. At the same time, Esplanade Market Solutions reserves the exclusive right to unilaterally deny Client's request and/or stop providing further services without specifying any details.