

## 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)
- Clear color copies of both sides of the bank card. All sensitive data on card must be covered – middle of the card number on both sides (the first 6 and last 4 digits should be visible) and CVC/CVV code on the back. Back side of the card must be signed by owner. If the holder's name is not printed on the card, copies of the card can only be accepted together with additional confirmation of the holder's name - a copy of the bank statement / screenshot from the online bank (with the URL), where the name of the holder would be seen, as well as the first 6 and the last 4 digits of the card number. If the transfer is made through the online wallet, then it must be confirmed that it belongs to the Client.

### 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.

### Copies quality requirements

- The copy must be in colour
- The copy must be distinct
- All the data on the documents must be visible and legible
- The documents must be in full size
- The edges of the documents shouldn't be cropped
- If there are any watermarks and patterns, they also must be distinct
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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 (the list is not exhaustive):

- Client provides falsified identification documents and/or has more than one account.
- 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 (both copies and originals) to restore the functionality of the account or confirm any other actions (or operations) both completed and those about to take place. In this case, if the Client wishes to continue using the services of the Broker, he can not refuse to provide the requested information.

10. 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.