

## **Anti-money laundering policy and know-your-client policy (AML&KYC).**

In order to protect the funds of our clients and ensure the compliance with international trade standards, BT Technologies LTD (hereinafter - the «Company») operates exclusively in accordance with the law on combating money laundering, gained by criminal means, and countering the financing of terrorism and criminal activities.

To monitor the accordance with legal requirements, the Company established Compliance department developing Anti-money laundering and Know your client (AML / KYC) procedures, obligatory for all employees of the Company and determining the policy of engagement with those registered on the Company's website <http://www.bulltraders.com/> (hereinafter - the «Site») and opened an account (hereinafter - the «company Clients»).

Compliance Department is intended to ensure that all the operations of the Company are consistent with the international standards to combat money laundering and all the documents provided by the client are up-to-date and comply with relevant legal requirements. Due to these facts by opening an account on the Site a Client performs complete and unconditional acceptance of the policy conditions, agrees with the following rules and undertakes to observe them:

1. The company is developing a list of documents, the provision of which is necessary for a Client for the purpose of identity verification, namely: color passport copy (first and second pages with photos, as well as a page with the data on registration) or a color copy of a document, which is proper for Client's identity verification under the law of the country of residence. Upon the request of the Company additional documents can be provided - a copy of a driver's license, a receipt for payment of utility bills (to confirm the place of residence of the Client). Also, the verification process involves mandatory confirmation of Client's phone number.
2. The withdrawal from the Client's account is allowed only after the verification of a Client on the basis of provided proper documentation and completed questionnaire. The withdrawal is carried out only to the account belonging to a person identified as a client of the company (the owner of a personal account on the site). The withdrawal of funds to third parties is prohibited. Internal transfers between the Company's clients are also forbidden.
3. The Company is obliged and has the right without obtaining prior consent to share with financial institutions and law enforcement agencies any information about a Client, as required by applicable law, and a Client gives the Company his consent to these actions. In order to comply with this paragraph, the Company holds any information about payment transactions of a Client during five years at least.
4. A client undertakes to respect the legal norms, including international ones, aiming to combat illicit trafficking, financial fraud, money laundering and legalization of funds obtained by illegal means;
5. A Client undertakes to make maximal effort to avoid direct or indirect complicity in illegal financial activities and any other illegal transactions using the company's website.
6. A Client guarantees the legal origin, legal ownership and the right to use the funds transferred to the account.

7. In case of the evidence of suspicious transactions at the Client's account, cash replenishments from untrusted sources (for example, the data of assets' sender and trading account's owner are not the same) and / or any actions with signs of fraud (including any refunds or cancellation of payments), the Company reserves the the right to conduct an internal investigation, to block or close a Client's account, cancel any payment and to suspend operations on the account before the end of the official investigation. When making the decision the Company is guided by the provisions of the applicable law or by common practice.
8. The Company has the right to request additional information about a Client if the withdrawal method is different from the input method. The Company also reserves the right to block a Client's account during the investigation, if a Client refused to provide the additional information requested by the Company.
9. In the course of investigation the Company has the right to request additional copies of the documents confirming the identity of a Client, as well as copies of bank cards used to replenish the account, payment and other documents confirming the lawful possession and legal origin of funds. In the case of providing the copies of the documents, the Company has the right to demand the provision of original documents for review.
10. The company will especially scrutinize clients, defined by the applicable law as located in high-risk countries.
11. The refuse of the Company to perform the operations that are considered from the point of view of the Company as suspicious (including blocking or closing of a Client's account) is not the reason for civil liability of the Company for failure to fulfill obligations to a Client.
12. The Company is not obliged to inform clients and other persons about the measures taken to counter the legalization (laundering) of proceeds from crime and terrorist financing, with the exception of informing the clients about the suspension of an operation, about the refuse of execution of a Client's order on carrying out operations, about the refuse to open a account, about the need of providing Client's documents.
13. This anti-money laundering policy is an integral part of the client agreement, on the basis of which a Client opens an account in the personal space on the Site (<https://secure.bulltraders.com>).

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