

POLICY FOR ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM

This document (hereinafter referred to as the Policy for Anti-Money Laundering and Combating the Financing of Terrorism) includes basic conditions belonging to procedures of GG | Bnk Service (hereinafter referred to as GG | Bnk) focused on anti-money laundering and combating the financing of terrorism.

SERVICE IMPLEMENTING COMPLIANCE

Standard operating procedure contained in the Policy is coordinated and implemented within GG | Bnk Service.

GG | Bnk implementing compliance (hereinafter referred to as the Service) is responsible for acquisition, consideration and detection of data about any suspicious actions and for training of GG | Bnk staff for implementation of the relevant procedures. The Service establishes criteria, procedures and rules for the Customer identification, verification and monitoring of special transactions and technical specifications for the implementation of this Service Policy.

PROCEDURES OF “KNOW YOUR CLIENT” VERIFICATION

The Service performs the procedures of “Know Your Client” (KYC) verifications to minimize the probability of bringing to responsibility and protect from the Customer’s attempts to use the Service for carrying out activities prohibited by law.

According to KYC procedures, the Service analyzes the Customer’s transactions, moreover, collects and stores data on important facts, related to the Customers, probable Customers and their transactions.

According to the results of the Customer identification procedures, the Service saves the corresponding data in the Customer’s file. This procedure of the Customer identification is conducted by the Service once on a compulsory basis.

Obligations of the Service include ensuring the Customers’ rights safety and confidentiality of the relevant personal data.

The Service collects personal data of the Customer exclusively to the extent required for high quality Service to the Customers.

The relevant personal data on the Customers and previous Customers can be provided to third parties in exceptional limited cases, in accordance with the laws in force and agreements between the Service and the Customer.

The responsibilities of the Service include comprehensive safety of the Customers’ files, which include: statements of account, transaction reports, receipts, notes, internal correspondence, as well as other documents containing information about the Customer, moreover, electronic and paper forms of business correspondence are taken into account. This safety of the relevant documents by the Service is carried out for at least 5 (five) years as of the day of signing a specific agreement.

CUSTOMER IDENTIFICATION POLICY

In order to identify the Customers, the Service is entitled to request the following documents:

1. To verify My Account

- ID document (passport, driver's license, national identity card, photo (selfie), photo with passport (selfie);
- document confirming the presence of a residential address (bank statement, utility bills);
- verification of mobile phone by receiving code by SMS.
- e-mail verification by receiving a confirmation code;

2. To confirm business account it is necessary to provide:

- all documents listed in clause 1;
- set of constituent documentation of the company, which must include:
 - state registration certificate (registration certificate);
 - charter of the company;
 - deed of incorporation (if any);
- a document substantiating the rights and competence of the person responsible for carrying out the relevant transactions on behalf of the company without a power of attorney, etc.

DISCLOSURE AND EXPOSURE OF SUSPICIOUS ACTIVITIES

Any financial activities related to probably money laundering procedure belong to suspicious activities.

Own observations and practical experience of the Service, obtained or identified data are a rationale for the conclusion that a particular transaction is a suspicious action.

The Compliance Service is responsible for continuous monitoring and updating of own system to reveal suspicious activities.

DECLARATION OF COMPLIANCE

The Corporate Customer (representative of the Corporate Customer) hereby certifies that he has carefully read and understood the current Policy and that he (or this company) will carry out activities in strict compliance with the requirements and standards presented in this Policy, conduct his activities pursuant to the laws in force, rules and conditions, which control operation of the Corporate Customer.

The Corporate Customer (representative of the Corporate Customer) hereby agrees that he is responsible for his actions according to the laws in force in the area applied in the effective Policy, and bears responsible for failure to implement the relevant laws.