

OFG Cap. Ltd anti money-laundering policy

1. Scope of the Policy:

1.1. As part of our commitment to maintaining the highest standards and complying with all relevant regulations, it is the Company's policy to prohibit and prevent any cases of money laundering and terrorism financing.

1.2. Money Laundering is the participation in any transaction that seeks to conceal or disguise the nature or the origin of funds derived from illegal activities. Money laundering involves not only the proceeds of drugs trafficking, but funds related to other illegal activities, including fraud, corruption, organized crime, terrorism, human trafficking and many other crimes. Generally, the money laundering consists of three stages:

- Placement: introduction of cash originating from illegal/criminal activities into financial or non-financial institutions;
- Layering: separating the proceeds of criminal activities from their source through the use of layers of complex financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds and provide anonymity.
- Integration: placing the laundered proceeds back into the economy in such a way that they reenter the financial system as legitimate funds.

1.3. This Policy is developed and periodically updated by the OFG Cap. Ltd 20603 IBC 2012 (1 Floor, First St. Vincent Bank Ltd Building, James Street, Kingstown, St. Vincent and the Grenadines) (the Company) based on the general principles in relation to the prevention of money laundering and terrorism financing.

1.4. The Policy applies to all employees of the Company and aims to set up key roles and responsibilities for the staff members.

1.5. The Company has established principles and procedures to prevent money laundering and combat terrorism-financing, in accordance with the risk profile of its products, services, clients and geographic locations.

2. Clients Acceptance Policy:

2.1. In order to understand the client and the risks that the Company may be exposed to by starting the relationship with a particular customer – the Company has developed an internal Clients Acceptance Policy. The clients' acceptance policy incorporates the following:

- The criteria for accepting new clients;
- Categories of clients who are not acceptable for establishing a business relationship or an execution of an occasional transaction;
- Criteria for categorization of clients on a risk basis.

2.2. The Client's acceptance process is as follows:

2.2.1. Any new client has to submit documents required according to Know Your Client Procedures, or KYC procedures;

2.2.2. A potential client has to fill in a questionnaire that incorporates all necessary information for the Company;

2.2.3. All the necessary information is registered with the client profile.

2.3. Clients will not be accepted for opening an account with the Company if:

- They refuse to provide the information requested by the Company;

- They refuse to submit enough information;
- The documents submitted appear to be faulty;
- The client comes from one of the non-cooperative jurisdictions;
- The client has negative information/reports on him or is under investigation;
- The client is on the list of people involved in terrorism financing or known to be involved in activity connected to money-laundering or is listed in any relevant sanctions list;
- The Company or any of the related companies had business relationships with the client in the past and they were terminated due to the client not meeting its obligations.

3. Measures used for managing money laundering risks:

3.1. The risk-based approach of the Company involves specific measures and procedures in assessing the most cost-effective and appropriate way to identify and manage the money laundering and terrorism financing risks faced by the Company. Such measures include:

- Identifying and assessing the money laundering and terrorism financing risks arising from particular clients, financial instruments, services;
- Adherence to the current policies, procedures and controls;
- Managing and mitigating the assessed risks by the application of appropriate and effective measures, procedures and controls;
- Continuous monitoring and improvements in the effective operation of the policies, procedures and controls.

3.2. In addition, the Company has taken the following measures and procedures in order to manage and mitigate money-laundering and terrorist financing risks:

3.2.1. Established independent AML (anti money-laundering) functions;

3.2.2. Developed a clients' acceptance policy;

3.2.3. Incorporated KYC procedures;

3.2.4. Will ensure that cooperation on compliance with local laws and anti-money laundering regulations will be organized;

3.2.5. Will train employees of the Company on how to identify suspicious transactions and how to act in case they became aware of it.

3.2.6. Established record-keeping procedures.

3.3. The Company ensures that the measures and procedures that have been established across the Company are communicated to responsible employees of the Company on a timely basis.

3.4. Taking into consideration the assessed risks, the Company determines the type and extent of measures it will adopt in order to manage and mitigate the identified risks in a cost-effective manner. These measures and procedures include:

- Updating of the client due diligence procedures in respect of clients in line with their assessed money laundering and terrorism financing risks;
- Requiring the quality and extent of identification data for each type of clients to be of a certain standard;
- Obtaining additional data and information from the clients, where this is appropriate for the proper and complete understanding of their activities and source of wealth and

for the effective management of any increased risk emanating from the particular business relationship or the occasional transaction;

- On-going monitoring of clients' transactions and activities.

3.5. The Company will be in a position to demonstrate that the extent of measures and control procedures that applies are proportionate to the risk it faces for the use of services provided, for the purpose of money laundering or terrorism financing.

3.6. The Company monitors and evaluates, on an ongoing basis, the effectiveness of the measures and procedures that have been introduced for compliance purposes.

3.7. On implementing appropriate measures and procedures on a risk-based approach, and on implementing the client identification and due diligence procedures, Company finds data, information and reports that are published by following international organizations:

- FATF - www.fatf-gafi.org
- The Council of Europe Select Committee of Experts on the Evaluation of Anti-Money Laundering Measures (MONEYVAL) - www.coe.int/moneyval
- The EU Common Foreign & Security Policy (CFSP) - https://europa.eu/european-union/topics/foreign-security-policy_en
- The UN Security Council Sanctions Committees - www.un.org/sc/committees/
- The International Money Laundering Information Network (IMOLIN) — www.imolin.org
- The International Monetary Fund (IMF) – www.imf.org

4. Know Your Client Procedures:

4.1. The prime method for preventing money laundering is by carrying out “Know Your Client” procedures. With thorough knowledge of clients, counterparties and the origin of the client's funds unusual or suspicious behavior can be identified, including false identities, unusual transactions, changing behavior or other indicators where laundering may be occurring.

4.2. Client identification and due diligence procedures:

4.2.1. The Company ensures that the clients' identification records remain updated with all relevant identification data and information throughout the business relationship. The Company examines and checks, on a regular basis, the validity and adequacy of the clients' identification data and information it maintains.

4.3. Failure or refusal to submit information for the verification of clients' identity:

4.3.1. Failure or refusal by a client to submit the requested data and information for the verification of his identity and the creation of his profile, without adequate justification, constitutes elements that may lead to the creation of a suspicion that the client is involved in money laundering or terrorism financing activities. In such an event, the Company does not proceed with the establishment of the business relationship or the execution of the occasional transactions.

4.3.2. If, during the business relationship, a client fails or refuses to submit, within a reasonable time frame, the requested identification data and information, the Company reserves the right at its sole discretion to terminate the business relationship and close all the accounts of the client.

4.4. Collection of information:

4.4.1. Depending on the client type, appropriate information is collected. Specific client identification issues may include:

- Name and date of birth — verified through a certified copy of ID or passport;
- Address including postal code;
- Telephone number;
- E-mail address;
- Nationality;
- Details of the profession and other occupations of the client;
- Trading experience and investment knowledge;
- Other.

4.4.2. The acceptable method for the verification of a client's identity is the reference to an original document(s), issued by a designated authority, that carries the client's photo.

4.5. The Company will take the following measures in order to verify the identity of non-“face to face” clients:

4.5.1. Direct confirmation of the prospective client's true name and address;

4.5.2. Contact the client at his residence or office, before the establishment of a business relationship or the occasional transaction, using the telephone number verified from a reliable and independent source;

4.5.3. Contact the client through email using the address previously verified by the Company from independent and reliable sources.

4.6. Reliance on third parties for client identification and due diligence purposes:

4.6.1. The Company may rely on third parties for the client verification and due diligence procedures.

4.7. Ongoing monitoring of accounts and transactions:

4.7.1. The procedures and intensity of monitoring accounts and examining transactions are based on the level of risk and, as a minimum, aim to achieve the following:

- Identifying suspicious clients;
- Detecting unusual or suspicious transactions that are inconsistent with the profile of the client for the purposes of further investigation.

4.8. Enhanced due diligence for certain high risk clients:

4.8.1. In case of high risk clients due to any of the following reasons: name match results on World-check for PEP (Politically Exposed Persons) or organized crime, sanctions, countering the Financing of Terrorism (CFT) (may be a false positive if full details not available on world-check) the Client may be requested to submit any of the following as may be decided on a case-by-case basis:

- bank reference letter from an authorized credit institution or bank statement;
- tax clearance certificate;
- proof of clear criminal record i.e. police criminal clearance report;
- other.

4.9. Account blocking or closure of the Account:

4.9.1. The OFG Cap. Ltd has the absolute right to block or close the account of the Client if there are reasonable grounds for that.

4.9.2. This might be done in case of suspicious activity, suspicious transactions, refusal to provide information or documents requested by the OFG Cap. Ltd or due to a request from the designated Authorities.

4.9.3. In situations where the account of the Client gets blocked, the Client will be informed about that by email or through other means deemed suitable and cost-efficient for this purpose by the Company.

4.9.4. In situations when the account of the Client is subjected to termination by the Company, a letter of Termination will be prepared and sent out to the client, requesting to close all open positions and submit a withdrawal request for the remaining balance (if any). In case the instructions of the withdrawal are not received within 2 weeks – the funds will be transferred back to the same source it originated from (Bank account, credit/debit card, e-wallet account).

4.9.5. In situations when Client wishes to terminate the account, he can do so by a written request. The account will be checked for any pending requests/documentation. Once the account is ready for closure, the termination letter will be sent to the Client to confirm the closure.