

# Anti-Money Laundering Policy

Laundering money and illegal conversion in order to legalize criminal cash funds are performed through financial institutes among which there are non-bank financial institutions, stock exchanges, and brokerage companies.

The Anti-Money Laundering Policy which is targeted at combating laundering of money obtained through criminal activities is an integral part of HD Markets (Pty) Ltd's internal procedures.

Anti-money laundering measures are based on generally accepted standards and meet the modern requirements imposed on financial companies by regulators.

## ANTI-MONEY LAUNDERING INSTRUMENTS

In order to avoid concealment of illegal sources of funds for their consecutive usage as legal capital in money turnover, the Company not only conducts document identification of clients, but also runs the check regarding their business reputation and former convictions with the following regulatory procedures for information updating.

The Client identification procedure during the client's depositing and withdrawal of funds is conducted on the basis of official documents. The Company's KYC (Know Your Client) policy assumes not only document verification but is also designed to guarantee the client's law abidance along with its responsibility for funds used in operations.

Modern technologies are used for personal identification; they allow the Company to obtain necessary information regarding clients and control their actions on trading accounts. With the help of its record keeping system, the Company tracks suspicious transactions, which gives the opportunity for immediate provision of the required information to state agencies that carry out anti-laundering activities.

HD Markets does not open deposit accounts and does not accept or withdraw funds in the form of cash. All monetary transactions are performed through cashless settlements, while strict document recording of all interbank transactions is carried out. Besides, the Company can suspend the transmission of funds if there are any suspicions that operations have been carried out for criminal purposes. In such cases, the Company promises to provide information to corresponding state supervisory authorities regarding such operations without notifying clients