## AML (Anti money-laundering ) and KYC (Know Your Customer) policy

- 1. This policy of <a href="http://www.bf-fi.pro">http://www.bf-fi.pro</a> and its affiliates (hereinafter referred to as the "Company") to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Company requires its officers, employees and affiliates to adhere to these standards in preventing the use of Company's Services for money laundering purposes.
- 2. For the purposes of this policy, money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have been derived from legitimate origins or constitute legitimate assets.
- 3. Generally, money laundering occurs in three stages. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses. Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used for criminal purposes.
- 4. Each employee of Company, whose duties are associated with the provision of products and services of Company and who directly or indirectly deals with Client of Company, is expected to know the requirements of the applicable laws and regulations which affect Client's job responsibilities, and it shall be the affirmative duty of such employee to carry out these responsibilities at all times in a manner that complies with the requirements of the relevant laws and regulations.
- 5. To ensure that this general policy is carried out, management of Company has established and maintains an ongoing program for the purpose of assuring compliance with the relevant laws and regulations and the prevention of money laundering. This program seeks to coordinate the specific regulatory requirements throughout the group within a consolidated framework in order to effectively manage the group's risk of exposure to money laundering and terrorist financing across all business units, functions, and legal entities.
- 6. Each of the Company's affiliates is required to comply with AML and KYC policies.
- 7. All identification documentation and services records shall be kept for the minimum period of time required by local law.
- 8. All new employees shall receive anti-money laundering training as part of the mandatory new-hire training program. All applicable employees are also required to complete AML and KYC training annually. Participation in additional targeted training programs is required for all employees with day to day AML and KYC responsibilities.
- 8. Client is obliged:
- 8.1. to respect any requirements of law, including international, directed on fight against illegal trade, financial frauds, washing and legalization of the money received in the illegal way;

- 8.2. to exclude direct or indirect complicity of illegal financial activities and to any other illegal Operations with use of the Site.
- 9. Client guarantees a legal origin, legal ownership and availability at Client of the actual right to use of the money transferred by Client to Client's Account.
- 10. In case of suspicious or fraudulent cash replenishments, including use of the stolen credit cards and/or any other activities of fraudulent nature (including any returns or cancellations of payments), Company reserves the right to stop provision of Services and to block Client's Account, and also to cancel results of any Operations performed by Client and to investigate Operations of doubtful nature owing to what to suspend such Operations before clarification of the nature of emergence of money and the end of investigation.
- 11. During the investigation Company reserves the right to request from Client of the copy of the identity certificate (passport) and bank cards used for account replenishment, the payment, and also other documents confirming legal possession and a legal origin of money.
- 12. Client is forbidden to receive and use Services and/or the software for any illegal or fraudulent action, or for any illegal or fraudulent Operations (including money laundering) according to the legislation of the country of jurisdiction of Client or Company.
- 13. Refusal of Company of carrying out suspicious Operations isn't the basis for any Company's civil responsibility before Client or other third parties for non-execution of any liabilities in relation to Client.