

The City of London's first Advisory
Bitcoin Investment Brokerage



PRIMEWARE TRADES

Introduction

The Financial Services Authority ('Authority') is the regulatory body for the financial sector in the Isle of Man. The Objectives of the Authority are to secure an appropriate degree of protection for the customers of financial services providers, the reduction of financial crime and maintenance of confidence in the Island's financial sector through effective regulation,

The Authority is fully committed to continually reviewing the Island's legislation and regulations against the applicable international standards in relation to anti-money laundering and the countering of terrorist financing under both the Island and international legislation, Ardan International Limited ('AIL') is required to fully understand the identity of its customer and to also understand the accumulation of its source of wealth.

In order to achieve this AIL will request anti-money laundering documentation to meet its legal and regulatory obligation.

Why do we carry out these checks?

These requirements are designed to help identify suspicious transaction activity which could be linked to money laundering and/or terrorist financing.

What is money laundering?

Money laundering is the process by which illegally obtained funds are passed through a series of financial transactions in order to make it difficult to trace funds back to their criminal origins.

What is Terrorist financing?

Terrorist activity financing may involve funds raised from legitimate sources such as donations, profits from businesses and charitable organisations, as well as from criminal sources, such as the drug trade, the sale of weapons and other goods, fraud, kidnapping and extortion,

What are the implications?

If an individual or organisation is found to have taken part in, or assisted in, financing terrorist financing the penalties are severe. These range from reputational damage to fines and/or imprisonment and loss of licence to conduct business activity within the finance and investment sector.

Tax evasion Tax evasion is the general term for efforts by individuals, corporations, trusts and other entities to evade taxes by illegal means. Tax evasion usually entails taxpayers deliberately misrepresenting or concealing the true state of their affairs to the tax authorities to reduce their tax liability. Another activity commonly for evading tax liabilities using several small payments to avoid reporting thresholds. Tax evasion is an activity commonly associated with the informal economy and one measure of the extent of tax evasion is the amount of unreported income, namely the difference between the amount of income that should legally be reported to the tax authorities and the actual amount which is also sometimes referred to as the tax GUIDANCE ON ANTI-MONEY LAUNDERING This includes verification of identity, residential address and source of wealth.

Requirements for individual applicants

Proof of identity and residential address are required for all applicants.

- All ID documents MUST be current (not expired) and bear a photograph and signature of the applicant where possible. All ID documents MUST be suitably certified in accordance with the suitable certifier rules detailed on page 4.
- All ID documents should show the full name in full.

Proof of identity

- ID number
- Name of holder
- Date of birth
- Nationality and seniority
- Photograph
- Place of issue
- Issuing authority
- Date of issue and expiry

Note: if the client holds a passport where the signature is not present on the main details/photo page, we require a certified copy of the signature in addition to the certified copy of the main details/photo page.

Note: if the signature on the signature page of the passport has changed, we will require a specimen signature form.

Requirements for corporate applicants

All documents MUST be suitably certified in accordance with the suitable rules on page 4. The list of documents are:

- Certificate of incorporation or equivalent document
- Memorandum and articles of association
- Shareholder register or equivalent document
- List of directors
- Details as to whether the company is regulated
- Authorised signatory list on company letterhead (optional Original list of signature(s) or Original true certified copy)
- Corporate governance chart
- Latest set of accounts Proof of identity and address verification dated within the last 6 months for:
 - Shareholders holding more than 25% or more of the share capital of the company
 - All directors, if different to shareholders
 - All authorised signatories, if different to shareholders/directors
 - Any platform on-line user
- If a shareholder is a company, due diligence is required on this company

Proof residential address - list A

- Latest bank or credit card statement (for statements, we do not accept a print screen but will accept a downloaded statement converted to a PDF that doesn't need to be certified). Utility rates or council tax bill (we do not accept a copy but will accept a downloaded bill converted to PDF that does not need to be certified). Mobile telephone bills are not acceptable.
- Current driving licence issued by a government body
- Proof of ownership or rental at current residential address
- Mortgage Statement Tax assessment document Proof of payment for a PO Box service (which must also show the residential address) where the PO Box shown is also the correspondence address of the applicant

Source Of wealth

Documents not availab'e in applicant(s) to prove residential address - list a

Where the applicont resides in accommodation. shored accommodation or is in %'rt-time employment, a letter from his/her employet must state his/her full residential address includeine the PO 80K number. We also require o suitably certified residency visa. This should show the name Of the employer. One document from list A is required to verify the PO epx address.

AIL is committed to the international effort to detect prevent financial services being used to launder the proceeds of crime Or to support the financing terrorism. TO help with this. we must comply With legal and regulatc•ry Obligations in taking a risk- based OpprcXICH to Obtainine information about how our clients have acquired the %eth they will use to make investments or portfolio contributions. In some circumstances we require docun-.entary evidence to support The clients' source of Weath description. Please see below examples.

Where the applicant is sponsored by a spouse. we require a suit— obty certified marriage certificate and residency visa. In the event the spouse is not on existing client Of AIL we Will require suitably certified proof Of identity and residential address for thesponsor,

The list of acceptabÉ documents is not exhaustive. TO check if Other f orms Of are acceptable, please contact us.

| Generic description of source of wealth | Details required in application form | Additional documentation |
|---|--|---|
| Lottery/betting/ casino win | <div>Date of win</div> <div>Total amount</div> <div>Details of which organisation</div> | <div>Letter from relevant organisation (Lottery headquarters/ betting shop/casino)</div> <div>Or</div> <div>Certified copy of bank statement clearly showing the receipt of winnings</div> <div>Copies Of media coverage (if applicable) as supportive evidence</div> |
| Property sale | <div>Address of property</div> <div>Date of sale</div> <div>Total amount received</div> | <div>Signed letter from solicitor</div> <div>Or</div> <div>Signed letter from estate agent (if applicable)</div> <div>Or</div> <div>Certified copy of completion contract</div> |
| Inheritance | <div>Received from</div> <div>Relationship 'o E_H1efac'cg</div> <div>Date received</div> <div>Total o mount received</div> | <div>Grant of mobote (with O Copy of the which must include the value Of the estate.</div> <div>Solicitors letter</div> |
| Company sale | <div>Name of company</div> <div>Date of sale</div> <div>Total amount received</div> <div>Principal activity of company</div> <div>Applicant's share of sale proceeds</div> | <div>Signed letter from a solicitor</div> <div>Or</div> <div>Signed letter from regulated accountant</div> <div>Copies of media coverage (if applicable) as supporting evidence</div> |
| Inheritance | <div>Date of loan</div> <div>Total amount</div> <div>Name signature Of provider</div> <div>COPY Of loan agr</div> | <div>Certified copy of loan agreement</div> <div>Or</div> <div>Cerlified copÉsof loanstatements</div> <div>Signed letter detailing funds from a regulated accountant</div> |
| Sale of shares | <div>Date funds received</div> <div>From which company</div> <div>How long held</div> <div>Total amount received</div> | <div>Signed letter from a solicitor</div> <div>Or</div> <div>Signed letter from regulated accountant</div> <div>Copies of media coverage (if applicable) as supporting evidence</div> |

| | | | |
|--|---|---|-------------------------------------|
| <div>Source Of Wealth</div> | | <div>*tails requireci in application form</div> | <div>Additional documentation</div> |
| <div>Gift</div> | <div>Date received</div> <div>Total amount received</div> <div>Reason for Gift</div> | <div>Letter from Donor confirming details of gift and acknowledging the source of the donated funds</div> <div>Verification Of the identity Of Donor</div> <div>Donor's source of wealth — requirements of evidence as stated Relationship to benefactor above for each source of Wealth given.</div> | |
| <div>Income from Employment Normal and/or bonus</div> | <div>Annual income for the last 2 years</div> <div>Name of employer</div> <div>Nature of employers business</div> | <div>Last 3 months' payslips</div> <div>Or</div> <div>Confirmation from employer of income</div> <div>Or</div> <div>Copy of recent accounts if self employed</div> <div>Or</div> <div>Bank statement that clearly shows receipt of the most recent three months' regular salary payments from the named employer.</div> | |
| <div>Other income</div> | <div>Nature of the Income</div> <div>From who</div> <div>Total amount received</div> <div>Date received</div> | <div>Dependent of source of other income e.g. Maintenance payment; then copy of court order</div> <div>Or</div> <div>Certified copies of supporting documentation</div> | |
| <div>Moturine investments Date fur%is itied copy Of closing statement or</div> | <div>company</div> <div>From it received</div> <div>Total amount received</div> | <div>Or received Cert policy claim Which surrende r</div> <div>Letter confirming</div> | |
| <div>Compensation payment</div> | <div>Date received</div> <div>Total amount received</div> <div>Reason for payment</div> | <div>Solicitor's letter</div> <div>Court order</div> | |
| <div>Company profits</div> | <div>Company profits for the last 2 years</div> <div>Industrycompon*, 'operatein</div> | <div>Copy of the latest accounts or letter from regulated accountant giving details of company profit over the 2 years</div> | |

politically Exposed Person f the applicant. or any other party connected '0 the applZafion either now Or in 'hepast/tuture. could be classed as a potentially exposed person (PEP), or connected with O PEP, we Will requiredetails,

A PEP is holding On important mablic position, Ora person clearly reacted to them. Examples Of these ore but not limited to:

- Heads Of Sta te Of Gover nrnent
- SenÉR politicians
- Senior Government officials
- Judicial Or military Officio(S
- SenZr executives of publicly owned Corporations
- Imv»rlont politico' officials

MOST COMMON CERTIFIERS

The most common suitable certifiers are:

- A suitable certifier approved by AIL.
- An authorised representative of an embassy or consulate of the country who issued the identification document
- Notary public
- Lawyer, solicitor, advocate or attorney
- Commissioner of Oaths within a recognised jurisdiction
- Accountant who is a member of an institute or other professional organisation, which imposes on its members a requirement to abide by AML obligations
- A director or manager of an authorised credit or financial institution located and regulated in an equivalent jurisdiction to the Isle of Man
- A bank official
- A registrar or other civil or public servant authorised to issue or certify copy documents

if you cannot have your documents certified by one of the above, please contact us.

THIRD PARTY PAYMENTS REQUIREMENTS

We do not accept payments from a money exchange. Payments from a Third Party are considered on a risk-basis therefore we suggest you contact us for guidance.

FOREIGN DOCUMENTS AND TRANSLATION

All documents and certifications must be translated into English and certified as an accurate translation of the original document. We require both the original and translated document to be certified and all verification statements must be in English.

CERTIFICATION OF DOCUMENTS

All copies of original documentation must be properly certified. Improper certification could lead to delays. You must have seen the original document, before you can certify a copy of that document. Certification should take the form of:

- I. A statement: "I certify this document to be a true copy of the original" (or words to similar effect);
- II. The full printed name of the person performing the certification;
- III. The signature of the person performing the certification;
- IV. The date the document was certified which must be within 6 months
- V. The position or capacity of the certifier; and
- VI. Email and contact number of the certifier

If the document is more than one page the certifier can either:

- certify each page individually, or
- complete passport/identity card & proof of address verification form, which is available upon request

E Support@primewaretrades.com

Primewaretrades Tiading Limitad is certified by the
company House (1-1K) with reg number

PRIMEWARETRADES



PRIMEWARE TRADES

Tel: +44 743 898 2167
support@primewaretrades.com / <https://primewaretradesll.com>
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