

GUARDARIAN ANTI MONEY LAUNDERING (AML) AND COUNTER TERRORIST FINANCING (CTF) POLICY

OBJECTIVE OF THE AML/CTF POLICY

Guardarian is under the obligation to apply AML/CTF measures in the process of delivering the services. Guardarian staff is committed to pursue the highest standards of AML/CTF and Know Your Customer (KYC) compliance to mitigate the risk of Guardaran services being used to facilitate financial crimes.

Guardarian has implemented the AML/CTF Policy to ensure that all the necessary procedures are taken in order to achieve full compliance. In this AML/CTF Policy, Guardarian is dedicated to follow the provisions specified in the Estonian AML laws, EU and international AML standards.

AML POLICY

AML Policy is the procedure to prevent Guardarian services from being used for purposes of money laundering, terrorist financing or any other criminal activity. KYC measures are part of the AML Policy. The objective of KYC measures is to enable Guardarian to know their customers and be able to mitigate the above mentioned risks. Guardarian may update such procedures in the future to assure the compliance with the laws and best AML practice.

In case of any potentially suspicious or unusual transactions Guardarian undertakes appropriate measures to address those risks. All staff handling transactions may ask for additional documents such as proof of source of fund, employment etc., as deemed appropriate.

Guardarian keeps a well-organized procedure of maintaining all records including customer identification documents and related data. All customer's information and transactional history are stored confidentially and according to personal data protection laws.

In case of any suspicious activity, false documents or non-cooperation by the customer within the customer due diligence process, Guardarian is obligated to reject the customer's documents, close any existing accounts, and terminate the business relationship.

In accordance with the prescribed legislative requirements, Guardarian has certain record keeping, identification and reporting requirements.

Our compliance program consists of:

- Appointment a Money Laundering Reporting Officer (MLRO) who has a sufficient knowledge and expertise;
- Establishment and maintenance a risk-based customer due diligence (CDD), identification, verification and Know Your Customer (KYC) procedures;

- Establishment a risk-based systems and procedures for the monitoring of on-going customer activity;
- Establishment the procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate;
- Record keeping of customer's data for an appropriate period of time;
- Training all relevant employees.

SANCTIONS POLICY

Guardarian is prohibited from transacting with individuals, companies and countries that are on prescribed sanctions lists. Guardarian will therefore screen against United Nations, European Union and US Office of Foreign Assets Control (OFAC) sanctions lists in all jurisdictions in which Guardarian operates.