

**ANTI-MONEY LAUNDERING  
POLICY/POLITICA DE COMBATERE A  
SPALARII BANILOR (AML)  
TeleTrade - DJ International Consulting  
Ltd  
January 2015**

## ANTI-MONEY LAUNDERING POLICY

TeleTrade - DJ International Consulting Ltd

January 2015

### 1. Scope of the policy

Money Laundering is the participation in any transaction that seeks to conceal or disguise the nature or the origin of funds derived from the 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 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 re-enter the financial system as apparently legitimate funds.

This Policy is developed and periodically updated by the Risk Management/Compliance and Anti Money Laundering Officer of TeleTrade - DJ International

## POLITICA AML

TeleTrade - DJ International Consulting Ltd

January 2015

### 1. Scopul politicii AML

Politica AML este participarea la orice tranzactie care incearca sa ascunda sau sa deghizeze natura sau originea fondurilor provenite din activitati ilegale. Spalarea banilor nu implica numai veniturile obtinute din traficul de droguri, dar si din fondurile legate de alte activitati ilegale, inclusiv fraudă, coruptie, a criminalitatii organizate, a terorismului si a crimelor. In general, spalarea de bani se efectueaza in trei etape:

- Plasarea: introducerea de numerar provenit din activitati ilegale / criminale in institutiile financiare sau nefinanciare.
  - Stratificarea : separarea veniturilor din activitatile criminale constituie sursa lor, prin utilizarea de straturi de tranzactii financiare complexe. Aceste straturi sunt concepute pentru a impiedica pista de audit, pentru a ascunde originea fondurilor si pentru a oferi anonimatul.
  - Integrarea: plasarea sumelor spalate inapoi in economie in asa fel incat sa se reintroduca in sistemul financiar ca fonduri aparent legitime.
- Aceasta politica este dezvoltata si actualizata periodic de managementul riscului / de conformitate si de agentul AML al TeleTrade - DJ International

Consulting Ltd (the Company) based on the general principles set up by the Board of Directors of the Company in relation to the prevention of money laundering and terrorist financing.

The Policy applies to all employees of the Company and aims to setup key roles and responsibilities for the staff members as well as to ensure compliance with the following legislation:

- The Prevention and Suppression of Money Laundering Activities Law of 2007 (the Law);
- Directive DI144-2007-08 of the Cyprus Securities and Exchange Commission for the Prevention of Money Laundering and Terrorist Financing (the Directive).

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. All amendments and/or changes of current version of the Policy must be approved by the Company's Board of Directors.

## 2. Clients' acceptance policy

Inadequate understanding of the Client's profile and purpose of investment activity may expose the Company to a number of risks. In order to minimize such risks, the Company has developed the Client Acceptance Policy. In cases where transactions will be considered as suspicious, Company reserves the right to block account of client for time of investigation.

Consulting Ltd. (Compania) pe baza principiilor generale stabilite de catre consiliul de administratie al Companiei, in ceea ce priveste prevenirea spalarii banilor si a finantarii terorismului.

Politica se aplica tuturor angajatilor Companiei si urmareste sa configureze roluri-cheie si responsabilitati pentru membrii personalului, precum si pentru a asigura conformitatea cu urmatoarele legislatii:

- Legea din 2007 privind activitatile de prevenire si combatere a spalarii banilor (Legea);
- Directiva DI144-2007-08 din CySEC (Cyprus Securities and Exchange Commission) pentru prevenirea spalarii banilor si a finantarii terorismului (Directiva).

Compania a stabilit principii si proceduri pentru prevenirea spalarii banilor si combaterea, finantarea terorismului, in conformitate cu profilul de risc al produselor sale, a serviciilor, a Clientilor si locatiilor geografice. Toate modificarile si/sau modificari ale versiunii actuale a politicii trebuie sa fie aprobate de catre Consiliul de Administratie al Companiei.

## 2. Politica de Acceptare a Clientului

Intelegerea inadecvata a profilului Clientului si scopul activitatii investitionale pot expune Compania la o serie de riscuri. In scopul de a reduce la minimum astfel de riscuri, Compania a dezvoltat Politica de Acceptare a Clientului. In cazurile in care tranzactiile vor fi considerate ca fiind suspecte, Compania isi rezerva dreptul de a bloca un cont de Client pe toata durata anchetei.

### 3. Risk-based approach

The Company applies appropriate measures and procedures, on a risk based approach, so as to focus its effort in those areas where the risk of money laundering and terrorist financing appears to be higher. This approach will enable the Company to assign to its clients the following risk categories:

- High risk Clients
- Medium risk Clients
- Low risk categories

### 4. Dynamic Risk Management

Risk Management is a continuous process, carried out on a dynamic basis. Risk assessment is not an isolated event of a limited duration. Client's activities change as well as the services and financial instruments provided by the Company change. The same happens to the financial instruments and the transactions used for money laundering or terrorist financing.

### 5. Know Your Client Procedures

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 Client's funds, unusual or suspicious behaviour can be identified, including false identities, unusual transactions, changing behaviour or other indicators where laundering may be occurring.

### 3. Abordare bazata pe riscuri

Compania aplica masuri adecvate si proceduri, pe o abordare raportata la risc, astfel incat sa se concentreze eforturile in acele zone in care riscul de spalare a banilor si finantarii terorismului pare sa fie mai mare. Aceasta abordare va permite Companiei sa clasifice Clientii sai cu urmatoarele grade de risc:

- Clienti cu grad de risc ridicat
- Clienti cu grad de risc mediu
- Categoriile cu risc scazut

### 4. Managementul riscului

Managementul riscului este un proces continuu, efectuat pe principii dinamice. Evaluarea riscurilor nu este un eveniment izolat pe o durata limitata. Activitatile Clientului se schimba, precum si a serviciilor si a instrumentelor financiare oferite de Companie. Acelasi lucru se intampla si cu instrumentele financiare si cu tranzactiile utilizate pentru spalarea banilor sau pentru finantarea terorismului.

### 5. Cunoaste procedurile Clientului dumneavoastra

Metoda primara pentru prevenirea spalarii banilor este indeplinind procedurile "Cunoaste-ti Clientul". Avand o cunoastere aprofundata a Clientilor, a partenerilor contractuali si a originii fondurilor Clientului, un comportament neobisnuit sau suspect poate fi identificat, inclusiv identitatile false, tranzactiile neobisnuite, schimbarea comportamentului sau alti factori, unde ar putea sa apara spalarea de bani.

## 6. Reporting of Suspicious Transactions to MOKAS

### Suspicious Transactions

Suspicious transactions are transactions or other activities that have no apparent lawful purpose or is not the sort in which a particular Client would normally be expected to engage in and the Company knows of no reasonable explanation for the transaction or activity after examining the available facts, including the background and possible purpose of the transaction or activity. The Company, in cases where there is an attempt of executing transactions which knows or suspects that are related to money laundering or terrorist financing, reports, through the Compliance Officer its suspicion to MOKAS.

## 6. Raportarea tranzactiilor suspecte catre MOKAS

### Tranzactii suspecte

Tranzactiile suspecte sunt tranzactii sau alte activitati care nu au un scop aparent legal, in care un anumit Client ar trebui in mod normal sa se angajeze in acea tranzactie, iar Compania nu are nicio explicatie rezonabila pentru acea tranzactie sau activitate dupa examinarea datelor disponibile, inclusiv de fundal si scopul posibil al tranzactiei sau al activitatii. Compania, in cazurile in care exista o incercare de a se executa tranzactii care se stiu sau se suspecteaza ca ar fi legate de spalarea banilor sau de finantarea terorismului, va raporta suspiciunea catre Ofiterul de Conformitate al MOKAS.