

Anti-Money Laundering and Know Your Client Policy

1. Purpose and Scope

Capplace.com operated by Robertson Finance Inc (“Capplace”, “we”, “us”, “Company”), is required to comply with the applicable legal framework on the prevention and suppression of money laundering and terrorist financing.

The purpose of this AML/KYC Policy is to set out the procedures and controls established for the detection, prevention, and information dissemination on money laundering activities, as well as the prevention, detection, and reporting procedures and the training of responsible officers and personnel. The procedures and controls that have been enacted will be ascertained on a risk-based approach, taking into consideration the ML/TF risks of any given potential client or business relationship.

Besides the above, we hereby provide the applicable Know Your Client (KYC) procedures for the identification and verification of the client’s identity when opening an account and for the necessary updates we perform periodically over time.

This policy will be updated once needed to ensure our consistent compliance with the applicable legal framework.

2. Anti-Money Laundering Definition

The term Money Laundering under this Policy shall mean the process of concealing or disguising the existence, source, movement, destination, or illegal application of illicitly derived funds or property for the purposes of making those funds appear legitimate. In line with this, Anti-Money Laundering (AML) refers to procedures, regulations, and laws designed to prevent attempts to disguise illegally obtained funds. The money laundering offense may be committed by:

- i) Any person knowing that any monetary instrument or property represents, involves, or relates to, the proceeds of any unlawful activity, transacts or attempts to transact said monetary instruments or property.
- ii) Any person knowing that any monetary instrument or property involves the proceeds of any unlawful activity, performs or fails to perform any act as a result of which he facilitates the offense of money laundering referred to in paragraph (i) above.
- iii) Any person knowing that any monetary instrument or property is required under the applicable framework to be disclosed and filed with the MISA Department of Anti-Money Laundering (DAML), fails to do so.

3. Organisational Arrangements

- ❖ The Company takes all reasonable measures to ensure that accounts are not used for the purpose of holding assets obtained as the result of or for facilitating the commission of any criminal activity or for any purpose contrary to applicable laws and regulations.
- ❖ The Company maintains policies and procedures to identify and avoid money laundering transactions and to ensure compliance with the requirements of the applicable legal framework. Such policies and procedures include among others, an appropriate training program for Company's staff.
- ❖ The Company will be vigilant in ensuring the prevention of their involvement or misuse in money laundering activities and will not knowingly accept assets or enter business relationships where there is reasonable cause to believe that such assets may have been acquired illegally or that they represent the proceeds of criminal activity.
- ❖ The Company will determine the identity of all its clients and will not open or maintain any trading accounts unless is satisfied of this requirement. In line with this, the Company established procedures to obtain appropriate evidence of client identity and will maintain adequate records in this respect.
- ❖ The Company's Board of Directors has the ultimate responsibility for the effectiveness of the Company's AML/CFT framework.
- ❖ Senior management is responsible for the development of sound risk management programs and for keeping the Board adequately informed about these programs and their effectiveness.
- ❖ The Company's policies should be periodically reviewed for consistency with the business model, and product and service offering. Special attention should be paid to new and developing technologies.

4. Risk Based Approach (RBA)

The Company follows a risk-based approach (RBA) to ensure that measures to prevent or mitigate money laundering and terrorist financing are commensurate with the risks identified. The Company's risk-based approach takes into account client acceptance and on-going monitoring policies and procedures that assist the Company in identifying the types of clients that are likely to pose higher money laundering and terrorist financing risks.

The Company adopts reasonable criteria for assessing the risks in line with the applicable framework. The Company conducts periodic reviews to determine whether any adjustment should be made to its risk rating.

5. Client Due Diligence and KYC

Client due diligence ("CDD") will be carried out with respect to any new or potential clients for the purposes of gathering information/documentation to identify and mitigate risks of money laundering, financing terrorism, and other illicit activities. The conduct of CDD and collection of documents will apply before and during the establishment of a business relationship. CDD must be regularly renewed to ensure it remains up-to-date. Before accepting a new client, KYC and due diligence procedures are followed, by examining the following factors:

- Clients' identity and background
- Public or high-profile position (i.e. PEPs)
- Linked accounts
- Business activities
- Any other risk indicators

Enhanced due diligence may be applied in cases where is justified by the associated risk or parameters set by the Company.

The Company will obtain, document and regularly update information in relation to the client's identity, address, source of funds, occupation, and expected business or transactional activity accompanied by documents verifying this information. Information collected will be verified by the collection of identification documentation, and via independent and reliable sources to confirm the veracity of the identifying information obtained.

Without limiting the generality of the aforesaid, the Company may, when establishing a business relationship:

- i. obtains information on the purpose and nature of the business relationship and the source of funds;
- ii. adequately identifies the client's identity (name, address, contact information and source of funds);
- iii. have appropriate risk management systems to determine if a potential client, or beneficial owner is, is likely to be, is found to be or becomes a Politically Exposed Person ("PEP"), and if so, will:
- iv. perform due diligence measures on a risk-sensitive basis; and

As part of the due diligence process, the Company should:

- i. Use reasonable measures to verify and adequately document the identity of the client or account holder at the outset of a business relationship. This process should include, where appropriate:
 - a. Taking reasonable measures to understand the identity of the client;
 - b. Obtaining information on the purpose and intended nature of the business relationship, the source of funds, and the source of wealth, where applicable; and
 - c. Discontinuing the transaction if client documentation information is not forthcoming at the outset of the relationship.
 - d. Using enhanced due diligence procedures for high-risk clients or transactions or business relationships.

6. Client Identification of Physical and Legal Persons

The Company establishes, verifies and keeps appropriate records regarding the true identity of its clients based on official documents. The Company verifies the true identity of its clients who are physical persons and in the case of corporate clients verifies their legal existence and organizational structure as well as the authority and identification of all persons purporting to act on their behalf. The Company does not maintain or/and prohibits the opening of anonymous trading accounts or/and under fictitious names.

Documents and information that the Company will collect in order to establish the physical persons identity include but are not limited to:

- i. Full name;
- ii. Date of birth;
- iii. An up-to-date ID/Passport number and nationality;
- iv. Genuine photograph depicted in an official document such as a passport, national ID card or driver's license;
- v. Residential address of the client (corroborated by a valid utility bill, telephone bill or bank statement);
- vi. Confirmation of the business relationships with the client (purpose of the planned transactions and the source of funds);
- vii. Confirmation of whether the client is included in PEP lists, sanctions and/or other watchlists;
- viii. Information on the origin of funds and other information on the physical person's occupational background;
- ix. The Company may collect additional documents or request the completion of further verification procedures in order to satisfy its obligations, including those relating to the source of wealth and source of funds (e.g. bank statements, tax returns, or pay slips).

Documents and information that the Company will collect in order to establish the legal person's identity include but are not limited to:

- i. Name of the corporate entity, identifier, or registration number;
- ii. Principal place of business and registered office;
- iii. Contact telephone numbers;
- iv. Information/Documentation on the beneficial owner;
- v. In case of involvement, the identity of the beneficial owner (full name, a photograph of official documents, residential address, and the relationship between the beneficial owner and client)
- vi. A certified copy of the Certificate of Incorporation;

- vii. Satisfactory evidence of the identity of all account signatories, details of their relationship with the company and if they are not employees, an explanation of the relationship. All signatories must be verified in accordance with the identification and verification of identity requirements of natural persons;
- viii. Identity information on the natural persons with significant control of the corporate entity. However, if the company is publicly listed on a recognized stock exchange and not subject to effective control by a small group of individuals, identification and verification of the identity of shareholders is not required;
- ix. Confirmation before a business relationship is established, by way of company search and/or other commercial enquiries that the applicant company has not been, or is not in the process of being dissolved, struck off the companies register, wound-up or terminated;
- x. Description and nature of business;
- xi. Purpose of the account and source of funds;
- xii. By-laws and any other relevant corporate documents filed with the Companies' Registry;
- xiii. Satisfactory evidence of identity must be established for at least two directors, one of whom should, if applicable, be an executive director where different from account signatories; and
- xiv. Such other official documentary and other information as is reasonably capable of establishing the structural information of the corporate entity.

The Company may also request you to provide additional information accompanied by the relevant documentation.

7. Record Keeping

The Company maintains records for client transactions which are safely stored for five (5) years from the transaction date. With respect to closed accounts, the records of client identification, account files, and business correspondence are preserved and safely stored for at least (5) five years from the date the relevant business or transaction was completed, or the termination of the business relationship.

The Company will ensure that client information and transaction records are available to authorities upon request.

8. Reporting

The Company will promptly report suspicious/covered transactions relating to clients' trading accounts within the timeframe specified by the law or by the Supervising Authority. The Company will pay special attention to all complex, unusual, or large business transactions, or unusual patterns of transactions, and to insignificant but periodic transactions, that have no apparent economic or lawful purpose.

The Company will observe and implement procedures aimed at monitoring client and account activity in order to adequately identify indicators relating to transactions and patterns, source of

funds and wealth, and geographical risk, in line with the FATF recommendations/international standards on combating money laundering and the financing of terrorism & proliferation.