

ANTI-MONEY LAUNDERING POLICY

TeleTrade - DJ International Consulting Ltd

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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 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.

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 behavior can be identified, including false identities, unusual transactions, changing behavior or other indicators where laundering may be occurring.

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.