

## **AML POLICY**

This Policy is meant to provide the information that TOTAL GROUP Ltd company (“Company”) strictly complies with all applicable laws and regulations of anti-money laundering (AML) and countering the financing of terrorism (CFT) policies. Thereby the Company carries out group of actions aimed at revealing criminally-obtained funds and their legalization countermeasures in correspondence with the international requirements.

Date of the latest update: 12.04.2023

### **1. IDENTIFICATION AND VERIFICATION OF CLIENTS**

- 1.1. According to AML and KYC (Know Your Client) policies, the Company identifies the Client and verifies their true identity on the basis of documents and data both at the moment of starting a business relationship with the Client and on ongoing basis.
- 1.2. While the registration process the Client provides the identification information to the Company including the Client’s full name, date of birth, country of residence, mobile number and e-mail.
- 1.3. After receiving the identification information, the Company should verify the information requesting the appropriate documents.
  - 1.3.1. The appropriate document verifying the Client’s identity is a high resolution scanned copy or a photo of a passport or a driving license or any other national ID.
  - 1.3.2. The appropriate document verifying proof of address is a high-resolution copy or a photo of a utility bill or a bank reference issued within the last 3 months.
- 1.4. At the Company’s request the Client is required to provide a scanned copy or a photo of front and back side of the credit/debit card. The front side should show the cardholder’s full name, the expiry date and the first six and the last four digits of the card number. The back side should show the cardholder’s signature, CVC2/CVV2 code must be covered.
- 1.5. The Company shall monitor the Client due diligence and accounts on the regular basis in order to determine the level of risk they pose and to reveal whatever changes in information about the Client.
- 1.6. If the Company believes the business relationship with the Client to pose a potentially high risk of money laundering or terrorism financing, the Company is entitled to ask for whatever additional data and documents that may be deemed necessary in the situation.

1.7. The Client is obliged to inform immediately of any changes in the personal or contact information.

## **2. PAYMENT POLICY**

- 2.1. In order to minimize the risk of money laundering and terrorism financing the Company neither accepts nor pays off cash money under no circumstances.
- 2.2. The Company reserves the right to refuse processing a transaction at its any stage, if the Company believes the transaction to be connected in any way with money laundering or criminal activity.
- 2.3. According to international legislation, the Company is prohibited from informing the Client that they have been reported for suspicious account activity.
- 2.4. The name of a person making a deposit of funds should be the same as the Client's name in the Company's records. Payments from third parties are not accepted.
- 2.5. The Company requires strict adherence to established deposit/withdrawal procedure. Funds can be withdrawn to the same account and using the same method as when depositing. When withdrawing, a name of a payee should be the same as the Client's name in the Company's records. If the deposit has been made via wire transfer, the funds should be withdrawn via the same transfer to the same bank and to the same bank account as when depositing. If the deposit has been made by means of a payment system, the funds can be withdrawn via online transfer to the same payment system and to the same account as when depositing.
- 2.6. The compliance with the AML policy requires withdrawal of funds to be made in the same currency as when depositing.
- 2.7. The Company maintains transaction records for a minimum of 5 years after termination of the business relationship with the Client.

## **3. PERSONNEL TRAINING**

- 3.1. The Company appoints an AML Compliance Officer who is fully responsible for the Company's compliance with CFT and AML policies, establishing and maintaining the Company's AML program, AML training employees, receiving, investigating and maintaining internal suspicious activity reports.

- 3.2. All the employees, managers and directors of the Company are suitably vetted while entering into employment.
- 3.3. Employees who are dealing with clients or are involved in any AML checking, verification or monitoring undergo AML training. Each new employee has to follow an AML training plan. The AML training program includes suspicious transactions identification training as well as training in prevention, detection and reporting of money laundering and terrorism financing crimes.
- 3.4. Any violation of the AML policy must be reported to the AML compliance officer, unless the violation implicates the AML Compliance Officer, in which case an employee must report the violation to the CEO.

#### **4. INTRODUCING CHANGES TO THE AML POLICY**

- 4.1. The Company reserves the right to review and/or amend the AML Policy, at its sole discretion, so please re-read it regularly. If the Client continues to use the website services or visits it, they agree automatically with changes introduced to the Policy.