

ANTI-MONEY LAUNDERING

ATIORA is required to comply with the Anti-Money Laundering and Countering Financing of Terrorism Legislation (AML/CTF Laws). To help the government fight the funding of terrorism and money laundering activities, law requires all financial institutions to obtain, verify, and record information that identifies each person opening an account. ATIORA has developed internal Anti-Money laundering and Counter-Terrorism Policy (hereinafter – AML Policy) based on the risk assessment, so the objectives of the AML/CFT Laws can be achieved. These are:

- to detect and deter money laundering and financing of terrorism;
- to maintain and enhance ATIORA's international reputation by adopting, where appropriate, recommendations issued by the Financial Action Task Force on Money Laundering
- To contribute to public confidence in the financial system.

By applying for an account with ATIORA you are taken to agree to the following terms:

- you warrant that you comply with all applicable anti-money laundering laws and regulations, including but not limited to the AML/CTF laws and associated rules and regulations (in force from time to time);
- You are not aware and have no reason to suspect that:
 - the money used to fund your deposit in your account has been, or will be, derived from or related to any money laundering or other activities deemed illegal under applicable laws or regulations or otherwise prohibited under any international convention or agreement (“illegal activities”); or
 - the proceeds of your investment in the Fund will be used to finance illegal activities; and
- you agree to promptly provide us with all information that we reasonably request in order to comply with all applicable laws and regulations relating to anti-money laundering;

According to the AML Policy, ATIORA will conduct initial and ongoing due diligence, depending on the level of risk posed by a particular customer.

For Retail Customers:

What this means for you: In compliance with the ANTI-MONEY LAUNDERING REGULATIONS, 2011 STATUTORY RULES AND ORDERS No. 46 of 2011, ATIORA will ask for the minimum identification information from each customer who opens an account. ATIORA will record the customer's identification information and the verification methods and results. ATIORA will also provide notice to customers that we will seek identification information and compare customer identification information with government-provided lists of suspected terrorists.

This minimum information may include:

- the customer's full name; and
- the customer's date of birth (if natural person); and
- the customer's nationality (if natural person); and
- if the person is not the customer, the person's relationship to the Customer; and
- the customer's address or registered office; and
- the customer's company identifier or registration number; and
- the expected origin of the funds to be used within the relationship; and
- occupation and name of employee (if self-employed, the nature of the self-employment).

In order to verify the abovementioned information ATIORA will require submitting the following documents:

A. for Individuals:

- a) Current valid passport, or
- b) National identity card, or
- c) Military ID card; or
- d) Driving licence which bears a photograph; and
- e) Documents proving current permanent address (such as utility bills, bank statements, etc.).

Please contact support@atiora.com to get more information regarding the verification procedure and documents requested from you.

B. For Corporate Customers:

- a) Certificate of Incorporation or any national equivalent;
- b) Memorandum and Articles of Association and statutory statement or any national equivalent;
- c) Certificate of good standing or other proof of registered address of the company;
- d) Resolution of the board of directors to open an account and confer authority on those who will operate it;
- e) Copies of powers of attorney or other authorities given by the directors in relation to the company;
- f) Proof of identity of directors in case he/she will deal with ATIORA on behalf of the Customer (according to the Individual identity verification rules described above);
- g) Proof of identity of the beneficial owner(s) and/or the person(s) on whose instructions the signatories on the account are empowered to act (according to the Individual identity verification rules described above).

For Wholesale Customers:

What this means for you: In compliance with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, this minimum information may include:

- the customer's full name; and
- if the person is not the customer, the person's relationship to the customer; and
- the customer's current permanent address or registered office; and
- the customer's company identifier or registration number; and
- the expected origin of the funds to be used within the relationship and source of wealth.

In order to verify the abovementioned information ATIORA will require at minimum submitting the documents specified above for corporate customers. ATIORA may also request you to provide additional information accompanied with respective documents.

Important Announcement Regarding Internal Money Transfers

ATORA has detected comments placed by Clients in various Forex forums, web-sites and blogs regarding the ways of money transferring between ATIORA accounts.

This is to inform that for the purposes of mitigating and managing the potential ML/TF risks faced by ATIORA, internal transfers between ATIORA Clients are permitted for the trading purposes. Trading purposes shall be defined as the purposes by which ATIORA in its sole discretion, may recognize as trading purposes aimed at generating profits from speculating activity according to the Agreement made between Client and ATIORA.

ATORA monitors the trading activity of each Client and reserves the right to block an account and prohibit any activity including, but not limited to withdrawals, in its sole discretion if ATIORA has reasonable grounds to suppose that the internal transfers of the account holder are in breach of the law and the ATIORA Anti-Money Laundering and Counter-Terrorism Policies and/or is not recognized by ATIORA to be used for trading purposes as expressly stipulated above.

Please be informed that based on the aforementioned, ATIORA following the suspicious account blocking shall conduct its internal review procedure regarding accounts in question for not less than 180 days and inform the respective authorities on the issue.