

Anti-Money Laundering and Know Your Client Policies

UpperTrade holds a zero tolerance fraud policy, and is taking all measures possible to prevent it. Any fraudulent activity will be documented and all related accounts to it will be immediately closed. All funds in these accounts will be forfeited.

UpperTrade aims to ensure the integrity of any sensitive data it obtains, such as clients' account information and the transactions clients' make, using a variety of security measures and fraud controls. Securing electronic transactions requires us to be provided with certain data from the client, including your preferred deposit method.

I. The AML & KYC policy applies to the Company, as well as its partners and Clients, and has the goal of preventing money laundering and any other illegal activity that facilitates money laundering or the financing of terrorist or criminal activities. The company requires its managers, employees and affiliates to follow the principles of this policy in order to prevent the use of the Company's services for the purposes of money laundering.

II. Within the framework of this policy, it is prohibited to conduct actions aimed at concealing or distorting the true origin of funds obtained by criminal means, in order to launder illegal proceeds.

III. Usually money laundering occurs in three stages. Initially, at the "placement" stage, cash flows into the financial system, where funds obtained as a result of criminal actions are converted into various financial instruments, such as money transfers, traveler's checks, or deposited in financial or banking institutions. At the "stratification" stage, funds are transferred or transferred to other accounts or to other financial or banking institutions for further purification of funds from their criminal origin. At the "integration" stage, money is returned to the economy and is used to purchase property, finance business or criminal activity. Funding for terrorism can use funds that are not derived from criminal activity; which can be regarded as an attempt to conceal the origin or intended use of funds that will later be used for criminal purposes.

IV. Every employee of the Company whose duties are related to the provision of the Services and who directly or indirectly deal with Clients should be aware of the requirements of the relevant laws and regulations relating to the job duties of an employee of the Company, and such employee will be obliged to continuously fulfill these obligations to the extent complying with relevant laws and regulations.

V. Each subdivision of the Company shall be governed by the policy of AML & KYC, drawn up in accordance with the requirements of the applicable law.

VI. The Company is obliged to keep all personal and official documents for a minimum period of time established by the requirements of the applicable law.

VII. All new employees of the Company must be trained on the subject of AML & KYC. Existing employees of the Company undergo similar training annually. Participation in additional training programs is mandatory for all Company employees related to AML & KYC.

VIII. The client undertakes to comply with legal norms, including international ones, aimed at combating illegal trade, financial fraud, money laundering and legalization of illegally obtained funds;

and to exclude direct or indirect complicity in illegal financial activities and any other illegal operations using the Site.

IX. The Client guarantees legal origin, legal possession and the Client's current right to use the funds transferred by the Client to the Account.

X. In the event of suspicious or fraudulent cash deposits, including the use of stolen credit cards and / or any other fraudulent activity (including any refunds or cancellation of payments), the Company reserves the right to stop the provision of services and block the Client's account, as well as cancel any transactions carried out by the Client and investigate transactions of dubious nature, as a result of which the operations are suspended until the nature of the occurrence of funds is ascertained and investigations.

XI. During the course of the investigation, the Company reserves the right to request from the Client copies of the identity card and bank cards used to replenish the account, payment, as well as other documents confirming the legal ownership and legal origin of the funds.

XII. The client is prohibited from using the services and / or software for any illegal or fraudulent activity, or for any illegal or fraudulent transaction (including money laundering) in accordance with the laws of the country in which the client or company is located.

XIII. The refusal of the company to conduct suspicious transactions is not a reason for the company to incur any civil liability to the client or other third parties for failure to fulfill any obligations towards the client.

What is Anti-Money Laundering Policy?

Anti-money laundering (AML) is a term mainly used in the financial and legal industries to describe the legal controls that require financial institutions and other regulated entities to prevent, detect, and report money laundering activities.

We treat money laundering as an illegal activity and stand at the forefront of fighting against any criminal activity. We always keep in touch with responsible industry authorities and keep a track of what goes down around, especially when it comes to our account holders.

We have policies in place to deter people from laundering money.

These policies include:

1. Ensuring clients have valid proof of identification maintaining records of identification information;
2. Determining that clients are not known or suspected terrorists by checking their names against lists of known or suspected terrorists;
3. Informing clients that the information they provide may be used to verify their identity;
4. Closely following clients' money transactions. Not accepting cash, money orders, third party transactions, exchange houses transfer or Western Union transfers.

Identification

The first safeguard against money laundering is sophisticated Know-Your-Client (KYC) verification. To ensure compliance with standard AML regulations, we require the customer to submit the documentation (the list of required documents check down below).

Monitoring

We do not accept third-party payments. All deposits must be made in your own name and match the KYC documents submitted. Due to AML regulatory policies, all funds withdrawn must be returned to the exact source from which they were received. This means that funds originally deposited via bank transfer will be returned to the same account when a withdrawal request is made. Equally, if you deposited via credit card, your funds will be returned to the same credit card when a withdrawal request is made.

We do not, under any circumstances, accept cash deposits or disburse cash when withdrawal requests are made.

Reporting

AML regulation requires us to monitor and track suspicious transactions and report such activities to the relevant law enforcement agencies. We also reserve the right to deny a transfer at any stage if we believe the transfer may be connected in any manner to criminal activity or money laundering. The law prohibits us from informing customers about reports submitted to law enforcement agencies concerning suspicious activity.

What is Know Your Client Policy?

Know Your Customer Policy (abbreviated KYC) - is a term of banking and exchange regulation for financial institutions and other companies working with money individuals; meaning that they must identify the counterparty, suitability and risks involved with maintaining a business relationship before conducting a financial transaction.

The objective of KYC guidelines is to prevent businesses from being used by criminal elements for money laundering. This helps them manage their risks in a well-judged manner. In order to verify the identity of the client, we ask to provide certain documents, in accordance with the international KYC policy.

The client must provide several documents to complete the trading account verification procedure:

1. Identity document

You can provide an identity document issued by a state authority:

- a. passport (full first page);
- b. driver's license (both sides);
- c. temporary residence permit (both sides).

Please note that a driver's license can be taken as proof of identity only if it is a plastic card, and all information in it contains only Latin transliteration.

2. Credit/Debit Card

A copy of the credit or debit card that was used to deposit funds. Copies of the card are made from the front and back. The first 12 digits on the front side and the CVV code on the back of the card must be covered; the signature strip, on which the client's signature stands, the cardholder's name and the last 4 digits of the card must be clearly visible.

3. Proof of residence

A document confirming the address of the actual location of the client or the billing address, such as bank statements or utility bills issued in the country of

permanent residence, the issuance of which does not exceed 3 months from the date of deposit.

- a. Utility bill;
- b. Electricity bill;
- c. Statement from the bank;
- d. Tax return;

If you do not have documents from this list that contain Latin transliteration, you can provide the following: confirmation from your place of work / study with your name, address and employment / study details with an official signature and stamp.

Please make sure the documents you provide meet the following requirements:

- a. Documents must be valid, their term of issue should not exceed three months;
- b. A document confirming the place of residence must contain your full name and address;
- c. The document confirming the place of residence must be provided in the form of a photograph or scan-copy of the original document;
- d. Documents must contain only Latin characters;
- e. The document confirming the place of residence must contain the date of issue.

4. Declaration of deposit

The deposit declaration confirms that the customer made a deposit of his own free will and that the card was used for the transaction belongs personally to the customer. (The client receives this document immediately after the trading account activation)

Please note that regulatory requirements differ in certain countries and we may need to request additional documentation.

Make sure your photos or scanned copies of documents meet the following requirements:

- a. Scanned copies of documents must have high resolution and be in color, black and white, watermarked, etc. are not accepted;
- b. The following image formats are allowed: JPG, GIF, PNG, TIFF or PDF;
- c. File size should not exceed 10 MB;
- d. Documents must contain Latin characters or have Latin transliteration;
- e. Background. The edges of the documents must be clearly visible on a contrasting background;

f. In case of poor quality of the submitted documents, the Verification Department may ask you to submit the documents once again.

The verification procedure usually does not take much time. However, in some cases it may take up to 24 hours. Our Verification department will do everything possible to review and accept the information provided by you as soon as possible.

We hold the security of documentation at highest priority and treats all documents it receives with utmost respect and confidentiality. All files we obtain are fully protected using the highest level possible of encryption at every step of the review process.

Please contact us with any questions, comments or for clarification.