

Anti-Money Laundering Policy

Money laundering is the act of converting money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human traffic, etc) into money or investments that appear to be legitimate. Such activity is used to hide the illegal source of money so that the material values cannot be traced.

The main purpose of the Policy is to establish the essential standards designed to prevent E-Global Trade & Finance Group, Inc (hereinafter called "Company") from being used for money laundering and terrorism financing.

Other objectives pursued by this Policy are as follows:

- Promote a "Know Your Customer" policy as a cornerstone principle for the Company business ethics and practices;
- Introduce a controlled environment where no business with a Customer is transacted until all essential information concerning the Customer has been obtained;
- Conduct self-assessments of compliance with AML policy and procedures.

Identification of the money laundering risks of customers and transactions allows us to determine and implement proportionate measures and controls to mitigate these risks. Some of the used risk criteria are the following:

- **Country risk**, in conjunction with other risk factors, provides useful information as to potential money laundering risks. Factors that may result in a determination that a country poses a higher risk include:

- countries subject to sanctions, embargoes or similar measures;
- countries identified by the Financial Action Task Force ("FATF") as non-cooperative in the fight against money laundering or identified by credible sources as lacking appropriate money laundering laws and regulations;
- countries identified by credible sources as providing funding or support for terrorist activities.

- **Customer risk** - there is no universal consensus as to which customers pose a higher risk, but the below listed characteristics of customers have been identified with potentially higher money laundering risks:

- armament manufactures,
- cash intensive business;
- unregulated charities and other unregulated “non profit” organizations.

Customer Due Diligence and Know Your Customer

- Prior to transact any type of business Company must determine and document the true identity of customers and obtain background information on customers as well as purpose and intended nature of the business;
- Company must obtain and document any additional customer information, commensurate with the assessment of the money laundering risk using Risk Based Approach;
- Company must establish whether the Customer is acting on behalf of another natural person or legal entity as trustee, nominee or professional intermediary. In such cases a necessary precondition for Customer acceptance is receipt of satisfactory evidence of the identity of any intermediaries and of the persons upon whose behalf they are acting, as well as the nature of the trust arrangements in place.

Record keeping

- Records must be kept of all documents obtained for the purpose of identification and all transaction data as well as other information related to money laundering matters in accordance with the applicable anti-money laundering laws/regulations;
- All records must be kept for at least 5 years.

Monitoring and reporting of suspicious transactions/activity

- All personnel must be diligent in monitoring for any unusual or suspicious transactions/activity basing on the relevant criteria applicable in the jurisdiction where the Company operates;
- The reporting of suspicious transactions/activity must comply with the laws/regulations of the respective jurisdiction.