



Anti-Money Laundering (AML) Policy

AML Policy

GC Global Finance Ltd. is operating under the trading name United SocGen, is an Authorized Money Services Business registered and existing in the Canada registration number **M23739966** and regulated by the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC").

GC Global Finance Ltd. is a registered Money Services Business as defined by the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)

GC Global Finance Ltd. has a Risk Management and Compliance Programme (RMCP) in place.

The Anti-Money Laundering Policy which is targeted at combating laundering of money obtained through criminal activities is an integral part of United SocGen's internal procedures. Anti-money laundering measures are based on generally accepted standards and meet the requirements imposed on financial companies by regulators.

ANTI-MONEY LAUNDERING INSTRUMENTS

In order to avoid concealment of illegal sources of funds for their consecutive usage as legal capital in money turnover, the Company not only conducts document identification of clients prior to account opening, but also runs the check regarding their business reputation and former convictions according to the regulatory procedures for information updating.

The Client identification procedure during the client's depositing and withdrawal of funds is conducted on the basis of official documents. The Company's KYC (Know Your Client) policy assumes not only document verification but is also designed to guarantee the client's law abidance along with its responsibility for funds used in operations.

Modern technologies are used for personal identification, which allow the Company to obtain necessary information regarding clients and control their actions on trading accounts. With the help of its record keeping system, the Company tracks suspicious transactions, which gives the opportunity for immediate provision of the required information to governmental competent authorities that carry out anti-money laundering supervision.

United SocGen does not open deposit accounts and does not accept or withdraw funds in the form of cash. All monetary transactions are performed through cashless settlements, while strict document recording of all interbank transactions is carried out. Besides, the Company reserves the right to suspend the transmission of funds if there are any suspicions that operations have been carried out for criminal purposes. In such cases, the Company is obliged to report any suspicious transactions and to provide the relevant information to the corresponding governmental supervisory authorities regarding such operations without notifying the clients.

The Company reserves the right to review and/ or amend its Anti-Money Laundering Policy, at its sole discretion, whenever it deems fit or appropriate.