

CLIENT IDENTIFICATION, KNOW YOUR CLIENT (KYC) AND DUE DILIGENCE PROCEDURES

1. General

1.1. Kaje Fin Services Ltd is a company incorporated in Marshall Islands under registration no. 83226 having its registered address at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands MH96960 (the “Company”)

1.2. This procedure shall govern the relationship between the Company and the Client whereby the Company will provide to the Client and the Client shall receive from the Company investment and ancillary services, in the manner described herein

1.3. The Company applies customer identification procedures, KYC and customer due diligence measures (i.e. prescribed identification process) in the following cases (inter alia):

- When establishing a business relationship;
- When carrying out occasional transactions that exceeds the prescribed threshold specified in the Act whether conducted as a single transaction or by way of two or more transactions that appear to be linked.
- When there is a suspicion of money laundering or terrorist financing, regardless of the amount of the transaction;
- When there are doubts about the veracity or adequacy of previously customer identification data.
- The prescribed identification process must also be carried out by the Company on:
 - a person conducting a transaction; and
 - a person on whose behalf a transaction is being conducted; and
 - beneficial owner,

if the reporting entity has reasonable grounds to believe that the person is undertaking a transaction on behalf of another person. In addition to the above, the Company must also verify that a person is authorised to undertake the transaction concerned on behalf of the other person. Failure to apply the above, this is an offence punishable upon conviction by:

(a) if the reporting entity is a natural person - a fine not exceeding 100,000\$ or imprisonment not exceeding 15 years, or both; or

(b) if the reporting entity is a body corporate - a fine not exceeding 100,000\$. In the case where the prescribed identification process cannot be carried out then the following must apply:

- (a) the account must not be opened for the person and
- (b) we must not enter into a business relationship with the said person and
- (c) if a business relationship already exists with a person then the existing business relationship must be terminated.

2. Customer Category

This Section defines the criteria for the categorisation of Clients based on their risk. The MLCO shall be responsible for categorising Clients in one of the following three (3) categories based on the criteria of each category set below:

i. Low Risk Clients

The following types of Clients can be classified as low risk Clients with respect to the Money Laundering and Terrorist Financing risk which the Company faces provided that the risk for money laundering and terrorist financing is low and there is no suspicion for legitimating income from illegal revenue or terrorism financing:

- (a) credit or financial institution in Marshall Islands or European Union or non-sanctioned third countries;
- (b) listed companies whose securities are admitted to trading on a Regulated Market in a country of the European Economic Area or in a non-sanctioned third country;
- (c) domestic public authorities of Marshall Islands, European Economic Area or in a non-sanctioned third country.

ii. Normal Risk Clients

Clients can be classified as normal risk Clients with respect to the Money Laundering and Terrorist Financing

risk when they do not fall under the 'low risk Clients' or 'high risk Clients'.

iii. High Risk Clients

The following types of Clients can be classified as high risk Clients with respect to the Money Laundering and Terrorist Financing risk which the Company faces:

- Clients who are not physically present for identification purposes (non-face-to-face Clients);
- Clients whose own shares or those of their parent companies (if any) have been issued in bearer form;
- Politically Exposed Persons (PEPs) – individuals (domestic and foreign) entrusted with prominent public functions, senior executive members of state owned corporations or international organisations and officials of a political party including their immediate family and close associates;
- All non-resident customers – especially customers who are from countries or regions or industries where a high level of crime is known to exist;
- Customers that work in certain industries or occupations where crime is known to exist;
- Industries at higher risk of being associated with money laundering include:
 - those with high earning potential and which are subject to controls and permits – e.g. fishing and logging
 - dealers in precious metals or stones; and
 - legal professionals and accountants who carry out transactions for their clients.
 - Non face-to-face customers – e.g. those which operate accounts via electronic means
 - Legal persons or arrangements, such as trusts that act as asset holding vehicles.
- any other Clients that their nature entail a higher risk of money laundering or terrorist financing;
- any other Client determined by the Company itself to be classified as such on the basis of its CAP.

Note: Considering the nature of the Company's business, being an online broker, the majority of the Company's clients are Non-Face-to-Face, implying that all of the Company's clients are, by definition, falling under the High Risk Customer category.

3. RISK CRITERIA ON MONEY LAUNDERING OR TERRORIST FINANCING

The MLCO identifies, records and evaluates four main risk criteria when assessing the extent of money laundering and terrorist financing risks. Based on the extent and the combination of the given risk criteria, a risk scoring will be obtained, where it will identify the ranking of each customer in relation to the risk faced by the Company on money laundering or terrorist financing.

The MLCO considers the following risk criteria:

- Customer risk;
- Country or geographical risk;
- Products and services risk; and
- Other variables such as:
 - the distribution channels and practices of providing services
 - the volume and size of transactions
 - the degree of risk associated with each area of services
 - the country of origin and destination of Clients' funds
 - deviations from the anticipated level of transactions
 - the nature of business transactions.

4. CRITERIA FOR NOT ACCEPTING CUSTOMERS

Categories of customers who are not acceptable for establishing a business relationship or an execution of an occasional transaction with our Company are the following:

- Clients who fail or refuse to submit, the requisite data and information for the verification of their identity and the creation of their economic profile, without adequate justification;
- Potential clients that require to open anonymous account;
- Potential new clients that do not appear to be legitimate are declined;
- Shell Banks;
- Politically Exposed Persons (PEPs) – individuals (domestic and foreign) entrusted with prominent public functions, senior executive members of state owned corporations or international organisations and officials of a political party including their immediate family and close associates;
- UBO listed in United Nations Security Council Consolidated List:

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>



Further details on not acceptable clients can be found on the Company's AML Manual.

5. Customer Identification Process:

The Company in the cases mentioned in section 1 above, must carry out the prescribed identification process.

The identification process to be applied for the following types of customers is as follows:

5.1. (a) Physical Person:

i. collect the following customer information set out in Table A of Schedule 2 of the Regulation as amended from time to time (enclosed herein as Annex 1) ; and

ii. at a minimum collect the following information:

- the customer's full name; and
 - the customer's date of birth; and
 - the customer's residential address; and
 - the customer's occupation; and
 - the purpose and intended nature of the business relationship with the reporting entity and
 - authorization of any person purporting to act for on behalf of the customer and the identity of the person and;
- iii. have an understanding on:
- the purpose and intended nature of the business relationship with the Company and
 - the customer's beneficial ownership and control structure

5.2.(b) Legal Person Customer (i.e. Corporate Client): Guidance on Beneficial Ownership Requirements of the Republic of the Marshall Islands Associations Law

Internationally agreed standards for anti-money laundering and combating the financing of terrorism and for transparency and exchange of information require jurisdictions to ensure the availability of beneficial ownership information for legal entities and arrangements connected to the jurisdiction. The Republic of the Marshall Islands ("RMI") Associations Law ("RMI Associations Law") includes recordkeeping requirements for beneficial ownership information that are in line with these standards and with similar obligations in other leading corporate jurisdictions.

This guidance was prepared by the RMI Registrar of Corporations responsible for non-resident domestic entities ("Registrar"). It is intended to serve as a general overview of how non-resident domestic entities might

comply with the requirement to collect and make available beneficial ownership information under the RMI Associations Law.

This guidance is not intended as a substitute for the RMI Associations Law. It is provided as a courtesy for general information purposes only and should not be construed as legal advice or a substitute for legal counsel. For legal advice or a legal opinion regarding the requirements for beneficial ownership recordkeeping for your non-resident domestic entity, please consult independent counsel.

What beneficial ownership records must be kept?

In addition to reliable and complete accounting records and up-to-date legal ownership records, the RMI Associations Law requires non-resident domestic entities to use all reasonable efforts to obtain and maintain an up-to-date internal record of the entity's beneficial owners.¹ These records may be kept in any form so long as they can be converted into legible written form within a reasonable time, and they must be kept for a minimum of five years. Bearer shares are subject to additional requirements (see What are the requirements for bearer shares? below).

Which entities must keep these records?

All non-resident domestic entities, except publicly-traded companies, are required to keep beneficial ownership records. "Publicly-traded company" is defined in each act of the RMI Associations Law and broadly includes companies listed on securities exchanges as well as their direct and indirect subsidiaries. An entity is a "subsidiary" of another entity if majority-owned by that other entity or included in that other entity's consolidated financial statements.

¹ For reference, see § 80(3) of the Business Corporations Act, § 37(1)(c) of the Revised Partnership Act, § 32(1)(c) of the Limited Partnership Act, and § 22(1)(c) of the Limited Liability Company Act.

Who is a "beneficial owner"?

In all cases, a "beneficial owner" will be a natural person. "Beneficial owner" has the same definition in each act of the RMI Associations Law: the natural person(s) who ultimately owns or controls, or has ultimate effective control of, a legal entity or arrangement, whether directly or indirectly, or on whose behalf such interest in such legal entity or arrangement is held.² This definition mirrors the

internationally agreed standards established by the OECD Global Forum on Transparency and Exchange of Information for Tax Purposes ("Global Forum") and the Financial Action Task Force ("FATF"). Guidance produced by these organizations on identifying beneficial owners of legal entities may be a helpful resource (see Other Resources below). The FATF Recommendations³ describe the determination of beneficial ownership information of legal entities as a two-step process:

STEP 1

(a) Identify the natural persons (if any) who ultimately have a controlling ownership interest in a legal person, and (b) where there is doubt as to whether the persons identified under (a) are the beneficial owners, or where no natural person exerts control through ownership interests, identify the natural persons (if any) exercising control of the legal person through other means.

STEP 2 Where no natural person is identified under (a) or (b) above, identify the relevant natural person who holds the position of senior managing official.

Step 1(a) – What is a controlling ownership interest?

A controlling ownership interest will depend on the company's ownership structure. The RMI Associations Law bases a controlling ownership interest on a threshold: holding more than 25% of the interests or voting rights in a legal entity. Thus, the starting point in most cases will be to assess whether one or more persons meet this threshold. The threshold may be achieved through direct or indirect ownership.

What is direct ownership?

An interest or voting right held and controlled by a natural person in his/her own name is directly owned by that natural person. Direct ownership is generally recorded in a share register, register of members or partners, or other register of ownership interests. An interest or right held jointly by natural persons may also be considered directly owned.

2 For reference, see § 80(3)(f) of the Business Corporations Act, § 37(1)(c)(v) of the Revised Partnership Act, § 32(1)(c)(v) of the Limited Partnership Act, and § 22(1)(c)(v) of the Limited Liability Company Act. 3 FATF (2012-2018), International Standards on Combating Money Laundering and the Financing of Terrorism &

Proliferation, available at: www.fatf-gafi.org/recommendations.html.

What is indirect ownership?

Indirect ownership may occur through a chain of companies or through a nominee shareholder arrangement. Where a share or right is held indirectly, the chain of ownership or nominee arrangement must be looked through to identify the underlying natural persons with a controlling ownership interest. Only natural persons can be "beneficial owners" under the RMI Associations Law. Where the holder of an interest or voting right is a legal entity, the direct owners of that shareholder-entity must be considered. Where one or more of these are also legal entities, the direct owners of these shareholder-entities must be considered too. This process should be continued until a determination can be made as to whether any natural person in the ownership chain meets the 25% threshold for the company in question.

EXAMPLE

The shares of Corporation A are 10% held by Corporation B and 90% held by Corporation C. Corporation B is 100% owned and controlled by Individual 1. Corporation C is owned and controlled 25% by Individual 1 and 75% by Individual 2. In this case, Individual 1 and Individual 2 are each an indirect owner of Corporation A. Corporation A is ultimately owned and controlled 32.5% by Individual 1 and 67.5% by Individual B. Both Individual 1 and Individual 2 exceed the 25% ownership threshold, so both are "beneficial owners" of Corporation A.

Similarly, shares held by a nominee on behalf of another person must be treated as belonging to that other person, not the nominee.

EXAMPLE

The shares of Corporation D are 100% held by Individual 3. Individual 3 holds the shares as a nominee on behalf of Individual 4 under the terms of a nominee arrangement. The shares must be treated as belonging to Individual 4, not the nominee. Individual 4 therefore exceeds the 25% ownership threshold and is the "beneficial owner" of Corporation D.

What if no natural person meets the 25% threshold?

Even if there is no natural person meeting the controlling ownership interest threshold, there may be control through other ownership means. Shareholders may collaborate to

increase a person's level of control through formal or informal agreements. If no natural person meets the 25% threshold, or if there is doubt as to whether a natural person meeting the threshold is the true "beneficial owner," any shareholder agreements, powers to appoint senior management, convertible stock, or outstanding debt that is convertible into voting equity should be considered. A natural person exercising indirect control over the legal entity through one or more of these other ownership means may be considered a "beneficial owner." **EXAMPLE**

The shares of Corporation E are held by 10 shareholders, each with 10% of the ownership and voting rights. All hold Class B shares except Individual 5, who holds Class A shares. Corporation E's articles of incorporation give Class A shares veto power over any sale of Corporation E's sole asset and any change to the nature of Corporation E's business. Individual 5, as the sole holder of Class A shares, may be considered the "beneficial owner" of Corporation E.

Step 1(b) – What is control through other means?

The RMI Associations Law states that if no natural person exerts control through ownership interests, the natural persons who exercise control through management or other means will be regarded as the "beneficial owner." Other means may include control through personal connections, the financing of the company, family relationships, historical or contractual associations, or default by the company on certain payments. There may be a presumption of control, even if not exercised, where a natural person uses, enjoys, or benefits from the assets of the legal person.

If no natural person exerts control through ownership interests, or if there is doubt as to whether the natural persons exerting control through ownership interests are the true "beneficial owners," a natural person exercising control of the legal entity through one of these other means may be considered a "beneficial owner."

EXAMPLE

Corporation F was founded, owned, and operated by Individual 6. Individual 6 has retired and transferred the shares of Corporation F in equal 16.667% proportions to her six children, none of whom exert control through ownership means. Though no longer officially involved, Individual 6 still regularly exerts substantial influence over

the decisions of board and the votes of her children as shareholders. Individual 6 may be considered the "beneficial owner" of Corporation F.

Step 2 – Who is a senior managing official?

As noted above, the RMI Associations Law states that if no natural person exerts control through ownership interests, the natural persons who exercise control through management or other means will be regarded as the "beneficial owner." Natural persons who may exercise control through positions held within a legal entity include those responsible for strategic decisions fundamentally affecting the entity's business practices or strategic direction and those with executive control over the entity's daily affairs. These may include directors (but not nominee directors), managers, or executive officers.

If no natural person exerts control through ownership interests or other means discussed above, the natural person(s) exercising control through management positions held within a legal entity may be considered "beneficial owners."

Who is not a "beneficial owner"?

A legal entity or arrangement is not a "beneficial owner" under the RMI Associations Law. Only a natural person may be a "beneficial owner." A nominee is not a "beneficial owner" under the RMI Associations Law. Shares held by a

nominee on behalf of another person must be treated as belonging to that other person, not the nominee. Similarly, persons acting on behalf of another person as a nominee director is not a "beneficial owner."

What are the requirements for bearer shares?

Existing and newly formed non-resident domestic corporations are permitted to issue bearer shares under the § 42(2) of the Business Corporations Act.

Bearer shares are subject to additional recordkeeping requirements, but these requirements are straightforward: the holders and beneficial owners of bearer shares must be recorded with the registered agent for non-resident domestic entities (the "Registered Agent") in the RMI. The validity, rights, and privileges of bearer shares and any transfer of bearer shares are conditional on this recordation. §§ 42(2) and 80(3)(c) of the Business Corporations Act. "Beneficial owner" has the same meaning as specified above (see Who is a "beneficial

owner"? and Who is not a "beneficial owner"?), but here the Business Corporations Act refers to the "beneficial owners of [the] bearer shares" rather than the "beneficial owners of the corporation."

EXAMPLE

The articles of incorporation of Corporation G authorize 100 registered and/or bearer shares. The directors authorize the issuance of 99 registered shares and 1 bearer share. Individual 7 purchases the 99 registered shares for his own benefit. Corporation H purchases and holds the 1 bearer share. Corporation H is 100% owned and controlled by Individual 8.

To be valid, and for Corporation H to exercise any rights or privileges as a holder of the bearer share, the required records must first be recorded with the Registered Agent. Corporation H should be recorded as the holder of the share and, unless Corporation H holds the share under a nominee or similar arrangement, Individual 8 should be recorded as the beneficial owner of the share.

Bearer share information may initially be recorded with the Registered Agent by completing the Declaration of Holders and Beneficial Owners of Bearer Shares. For any transfer after the initial recordation, the Declaration of Transfer of Bearer Shares may be used to record the necessary information on the new holders and beneficial owners of the shares with the Registered Agent. The Registered Agent adheres to strict data privacy requirements.

How should entities obtain ownership information?

The RMI Associations Law obligates the legal and beneficial owners of non-resident domestic entities to provide the required ownership details. Non-resident domestic entities are required to use all reasonable efforts to notify their legal and beneficial owners of their obligation to provide the information required to be kept by the entity. This requirement may be fulfilled through an annual written request for the requisite ownership details. Entities are entitled to rely on beneficial ownership details provided in response to these written requests unless the entity has reason to believe the responses are misleading or false.

How is compliance monitored?

Under internationally agreed standards, compliance with beneficial ownership recordkeeping requirements must be

monitored. To ensure the RMI meets its international obligations, the Registered Agent has been authorized under the RMI Associations Law to audit compliance with recordkeeping requirements. The Registered Agent may request beneficial ownership records in connection with its audit functions, and upon such a request, records must be provided to the Registered Agent in the RMI within 60 days. In addition, the RMI Associations Law requires non-resident domestic entities, except publiclytraded companies, to make an annual attestation that records are being maintained as required. For ease of use, the attestation has been integrated into the Registrar's formation and annual invoicing processes.

What are the penalties for non-compliance?

Knowingly or recklessly failing to maintain records as required under the RMI Associations Law is punishable by a substantial fine, forcible annulment, or both. There is an exception to liability for failure to maintain beneficial ownership information where all reasonable efforts have been undertaken to obtain and maintain the required information. Failure to produce records to the Registered Agent within 60 days upon request, failure to make attestations as required, willfully maintaining or producing false or misleading records, and making false or misleading attestations are also punishable by a substantial fine, forcible annulment, or both.⁶ With respect to bearer shares, the validity, rights, and privileges of bearer shares are conditional on recordation of the required ownership information with the Registered Agent. Bearer shares that do not comply become invalid and must be cancelled by the corporation.⁷ Other Resources The Trust Company of the Marshall Islands, Inc., Republic of the Marshall Islands Associations Law, available at: <http://www.registeriri.com/index.cfm?action=page&page=31>. FATF (2012-2018), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, available at: www.fatfgafi.org/recommendations.html FATF (2014), FATF Guidance: Transparency and Beneficial Ownership, available at: <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/transparencyand-beneficial-ownership.html>. OECD, Exchange of Information on Request: Handbook for Peer Reviews 2010-2016, 3d Edition, available at:

<http://www.oecd.org/tax/transparency/global-forum-handbook2016.pdf>.

5.3. (c) Legal Arrangement Customer:

i. collect the following customer information set out in Table A of Schedule 2 of the

Regulation as amended from time to time (enclosed herein as Annex 1) ; and

ii. at a minimum collect the following information:

- the full business name of the customer; and
- the full business address of the customer; and
- the type of customer; and
- the country in which the customer was established; and
- the full name and address of each of the trustee or similar positions of the customer; and
- the full name and address of each of the settlor or similar position, the protector (if any) or similar position and each beneficiaries (including through a chain of control/ownership) of the customer; and
- the authorization of any person purporting to act for or on behalf of the customer, and the identity of the persons; and
- the purpose and intended nature of the business relationship with the reporting entity and;

iii. have an understanding on:

- the purpose and intended nature of the business relationship with the Company and
- the customer's beneficial ownership and control structure

3. Customer Verification Process

3.1. General

The Company must carry out the prescribed verification process. The evidence of verification required should be obtained from documents issued by reputable, reliable and independent sources. Customer verification must be conducted within the prescribed event, circumstance and/or period timeframes as follows:

- i. Prescribed event; if there is suspicion that the customer is involved in or that the transaction involves ML, TF or other serious offences, the Company must verify the identity of the customer undertaking the transaction within 2 working days;
- ii. Prescribed circumstance: if there is suspicion on reasonable grounds that the customer is not the person he

or she claims to be, the Company must, within 3 working days; (i) collect the necessary identification information of the customer; or (ii) verify the customer's identification.

iii. Prescribed period: the Company must verify the identification of the customer within 5 working days except (i) if the Company's ML&TF risk is low or medium low, it must verify within 15 working days or (ii) if it reasonably believe that by doing so may inform the customer of the suspicions, the Company is exempted from conducting the verification process and must file a STR/SAR to the Republic of the Marshall Islands The Office Of The Registrar of Corporations.

6.1..Verification Process:

The verification process to be applied for the following types of customers is as follows:

(a) Physical Person:

The following combinations of documents from the list below are acceptable as verification for a physical person as per the Law and Regulations:

- i. Two 'Category A' documents, (enclosed herein as Annex 2) or
- ii. One 'Category A' document and two 'Category B' (enclosed herein as Annex2) letters, or
- iii. Three 'Category B' letters.

The Company ensures that customers provide at least one document capable of serving as photo identification. This may include a photo that is signed and verified by a person listed in 'Category B'. The Company may waive this photo requirement for customers where it is satisfied the person's identity can be adequately verified through other means. The Company adopts a risk-based approach. 'Category A' documents are more robust than 'Category B' documents. When verifying an individual's identity, a 'top-down' approach should be used by asking individuals to provide 'Category A' documents first, before drawing on 'Category B' documents. The process of identification should be documented and the Company should state in writing why the decision was made to accept Category B documents to verify an individual's identity.

***General Practice:**

Without prejudice of the above, the Company as a general practice will aim to collect the following documents in relation to:

- Name verification:

- Valid Passport
- National ID Card
- Current photo-card driving licence

The indicated documents should be valid and not less than 6 months from expiry date

- Address Verification:

- Proof of recent utility bill (water, electricity, gas etc.)
- Bank Statement
- Credit Card Monthly Statement
- Customer's tax identification number, Social Security Number or Government Service and Insurance System Number

The indicated documents should be valid and not more than 3 months old. Further to the above, the Company performs at all times a background check on the respective individual through various sources and databases so as to ensure that the client is neither a PEP, or involved in a ML or TF or other predicate offence. Such evidence is kept in the Company's records created for the respective individual.

6.2.(b) Legal Person Customer (i.e. Corporate Client):

The following documents should be obtained as verification for legal person customer:

i. Certificate of incorporation and any change of name certificates; where the corporate body is incorporated outside Marshall Islands, such certificates should be certified or, where the certificates form part of a business transaction record, such certificates should be notarized.

ii. Certificate of Directors

iii. Certificate of Shareholders up to the UBO(s)

iv. Certificate of By-Laws (Memorandum and Articles of Association)

i. Address of the registered office and name and address of registered agent, if applicable

ii. Address of principal place of business

iii. The originals or certified copies of any or all of the foregoing documents where required, should be produced and submitted for verification:

- Sworn Statement as to existence or non-existence of beneficial owners
- Appropriate Board of Directors' resolutions and signed application forms or account opening, identifying the

authorized signatories or principal officers of the corporation authorised to trade and their authorities and specimen signatures

iv. Board Resolution authorizing the corporation to open the account with the Company

v. Latest Audited Financial Statements (if applicable)

Verification of UBO(s), directors, authorized representatives: It is important to note that the verified identity of each of the beneficial owners of the company who hold an interest of 10% or more in the company and/or the persons on whose instructions the directors, the signatories on the account or the individuals authorized to deal with the reporting entity are empowered to act must be obtained at all times.

Further to the above, the Company should ensure that the potential corporate client has not been or is not in the process of being dissolved, struck off, wound-up or terminated. This can be done through the collection of Certificate of Good Standing or Non-Bankruptcy letter or through a search with the use of different databases and sources so as for the Company to reasonably establish that the potential corporate client is not in the process of any of the abovementioned.

(c) Partnerships:

Similar documents as described in section (b) above (i.e. corporate clients) must be collected and also, the identity of each individual partner who is an account signatory or who is authorised to give instructions to the reporting entity, should be verified as if he or she is a prospective direct personal client. In the case of a limited partnership, the identity of a limited partner need not be verified unless he or she is a significant investor (i.e. has contributed more than 10% of the total capital of the partnership).

(d) Legal Arrangements:

The identification of trustees or similar positions, settlors or similar positions, protectors or similar positions, any person having power to appoint or remove trustees or similar positions and any person (other than the settlor or similar positions) who has provided funds to the settlement should be verified as direct prospective clients (individual or corporate, as appropriate). In addition, the following should be obtained and understood:

- i. Evidence verifying proper appointment of trustees or similar positions, e.g. copy extracts from the Deed of Trust or a letter from a lawyer verifying the appointment;
- ii. Details of the nature and purpose of the arrangement; and
- iii. Details of the source of funds.

Furthermore, the Company should also obtain and verify the identity of the beneficiaries or the principal beneficiaries of a legal arrangement. If the legal arrangement is complex, it is accepted that this will not always be possible or necessary depending on the reporting entity's judgement of the money laundering risk involved. However if such a situation arises, the Company takes appropriate steps to satisfactorily identify the beneficiaries of the legal arrangement.

7. Certification of Documents

(a) Suitable Certifiers:

A certifier must be a suitable person, such as for instance a lawyer, accountant, director or manager of a regulated bank, trust company or trustee company, notary public or member of the judiciary. The certifier should sign the copy document (printing his or her name clearly underneath) and clearly indicate his position or capacity on it together with a contact address and telephone number.

The list of suitable certifiers is not intended to be exhaustive and Company exercises due caution when considering certified copy documents, especially where such documents originate from a country perceived to represent a high risk of financial crime or money laundering or from unregulated entities in any jurisdiction. Where certified copy documents are accepted, it is the Company's responsibility to satisfy itself that the certifier is appropriate. In all cases, the Company should also ensure that the customer's signature on the identification document matches the signature on the application form, mandate or other document.

(b) Reliance on Other Institutions to Verify Identity:

In those instances where the Company relies on due diligence conducted by another Institution it ensures that the KYC procedures of that other Institution are not weaker to those established by the Company or those applicable under the Law and Regulations.

8. Changes to Customer Status and Operations

The Company takes all necessary actions using the identification procedures and measures to provide due diligence, in order to collect the appropriate evidence in cases of:

(a) Changed to the customer identification standards such as:

- i. Change of directors/secretary
- ii. Change of registered shareholders and or actual beneficiaries
- iii. Change of registered office
- iv. Change of trustees
- v. Change of corporate name and/or tradename
- vi. Change of main trading partners and/or significant new business

(b) A material change in the way an account is operated such as:

- i. Change of persons authorized to handle its account
- ii. Request for opening a new account in order to provide new investment services and/or financial instruments.

(c) A significant transaction that appears to be unusual and/or significant than the usual type of trade and profile of the client

5. Enhanced Client Identification and Due Diligence (High Risk Clients)

5.1. General Provisions:

The Company shall apply enhanced due diligence measures, in addition to the measures referred to with respect to the Clients categorised as high risk Clients.

The following are examples of high risk customers:

- Politically Exposed Persons (PEPs) – individuals (domestic and foreign) entrusted with prominent public functions, senior executive members of state owned corporations or international organisations and officials of a political party including their immediate family and close associates.
- All non-resident customers – especially customers who are from countries or regions or industries where a high level of crime is known to exist.
- Customers that work in certain industries or occupations where crime is known to exist.
- Non-face to face clients
- Legal persons or arrangements, such as trusts that act as asset holding vehicles.

In general, in case of High Risk Clients the Company takes reasonable measures to:

- Collect and verify additional information on the intended nature of the business relationship;
- Collect and verify information on the source of funds or source of wealth of the customer;
- Collect and verify information on the ultimate beneficial owner of the customer;
- Collect and verify information on the reason for intended or performed transactions;
- Obtaining the senior management's approval of the reporting entity to commence or continue the business relationship;; and
- conduct regular and ongoing monitoring of the customer's transactions.

9. Non face-to-face Clients:

Considering the nature of the Company's business, being an online broker, all of the Company's clients are Non-Face-to-Face, implying that all of the Company's clients are, by definition, falling under the High Risk Customer category.

The Company shall apply the following with respect to non face-to-face Clients:

- i. Telephone contact with the Client at his home or office on a telephone number which has been verified from independent and reliable sources. During the telephone contact, the Company shall confirm additional aspects of the identity information submitted by the Client during the procedure of opening his account.
- ii. Collection of identification and documentation in original form or true copy of the original, where the certification is made by the Company in cases where it establishes the customer's identity itself, once the original is presented thereto, or
- iii. Requisition of additional documents to complement those which are required for face-to-face customers;
- iv. Seeking verification of the source of funds for the initial deposit, including sighting documentary evidence confirming the source of funds (e.g. submission of Income Tax Return and/or bank statement or any proof of income)

10. Politically Exposed Persons (PEPs)

Business relationships with individuals holding important public positions and with persons or companies clearly related to them may expose the Company to significant reputational and/or legal risks.

Politically Exposed Persons ("PEPs") are domestic and foreign individuals who are or have been entrusted with prominent public functions, including heads of state or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations and international organisations, and important political party officials. As part of the Company's duty to verify a customer's identification, the Company:

- i. gathers sufficient information from a new customer, and check publicly available information, in order to establish whether or not the customer is a PEP or is an immediate family member or close associate of a PEP.
 - ii. investigates the source of funds before accepting a PEP or a close associate or immediate family member of a PEP.
- The decision to establish a business relationship with a PEP should be taken at a senior management level.

11. Sanction Listed Client

Marshall Islands implement United Nations Security Council Consolidated List.

Business relationships with individuals listed in UN Sanctions list and with persons or companies clearly related to them may expose the Company to significant reputational and/or legal risks. Regarding this risk Customers who are Listed in UN Sanctions list are not acceptable for establishing a business relationship or an execution of an occasional transaction with our Company. On the account opening procedure, customer name, company name will be scanned in the United Nations Security Council Consolidated List (<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>)

The Consolidated List includes all individuals and entities subject to measures imposed by the Security Council. The inclusion of all names on one Consolidated List is to facilitate the implementation of the measures, and neither implies that all names are listed under one regime, nor that the criteria for listing specific names are the same. For each instance where the Security Council has decided to

impose measures in response to a threat, a Security Council Committee manages the sanctions regime. Each sanctions committee established by the United Nations Security Council therefore publishes the names of individuals and entities listed in relation to that committee as well as information concerning the specific measures that apply to each listed name.

During the CDD and the KYC procedure, company uses for Sanction check

- United Nations Security Council Consolidated List
(<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>)
- Uses the FATF's List Jurisdictions under Increased Monitoring - 21 October 2022
- OFAC sanction list
(<https://sanctionssearch.ofac.treas.gov/>)
- Consolidated list of persons, groups and entities subject to EU financial sanctions
(<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>)

12. Ongoing monitoring

Company runs a customer database once in 6 months for the updates in the 5. mentioned sanction lists.

13. Introduced Business

In the case where the Company relies on an intermediary third party in relation to due diligence procedures, the Company must:

- i. Satisfy itself that the intermediary is regulated and supervised and has measures in place to comply with the requirements of Part 2 of the AML&CTF Act;
- ii. Ensure that copies of identification documents and other relevant documents will be made available to it upon request without delay;
- iii. Immediately obtain the information required for customer due diligence requirements as described in the Manual

The Company uses the following criteria to determine whether it can rely upon an introducer:

- i. It must comply with the minimum customer due diligence practices identified in the AML&CTF Act, the AML&CTF Regulation and this Guideline;
- ii. The customer due diligence procedures of the introducer should be as rigorous as those which the Company would have conducted itself for the customer;
- iii. The Company must satisfy itself as to the reliability of the systems put in place by the introducer to verify the identity of the customer by auditing and reviewing the systems put in place by the introducer;
- iv. The Company must have a written agreement with the introducer that it will be permitted to verify the due diligence undertaken by the introducer at any stage; and
- v. As required by the AML&CTF Act, all relevant identification data and other documentation pertaining to the customer's identity should be immediately submitted by the introducer to the Company, which must carefully review the documentation provided to ensure that it has met its statutory obligations under the AML&CTF Act. (Such information must be available for review by supervisory authorities such as the RSI Bank Commission of Marshall Islands, where appropriate legal authority has been obtained).
- vi. The Company should conduct periodic reviews to ensure that an introducer that it relies on continues to conform to the criteria set out above.

14. Account operated by a third party

Once an account is opened for a client, particular care shall be taken in cases where instructions for transactions on behalf of said client is being made by another person or party. The Company requires for such person or party must be formally authorized by the client (owner of account) to make such transactions on his/her behalf and as such the Company requires the necessary documentation such as

- Special Power of Attorney (SPA) or;
- Duly signature-verified authorization given by clients (e.g. authorized to place an order, up to what amount and authorization to request and receive withdrawal).

15. Nominees or agents of third persons

The Company shall take reasonable measures to obtain adequate documents, data or information for the purpose

of establishing and verifying the identity, according to the procedures set in the Manual:

- (a) the nominee or the agent of the third person, and
- (b) any third person on whose behalf the nominee or the agent is acting.

In addition, the Company shall obtain a copy of the authorisation agreement that has been concluded between the interested parties.

16. ON-GOING MONITORING PROCESS

16.1.General:

The Company aims to have a full understanding of normal and reasonable account activity of its Clients as well as of their economic profile and has the means of identifying transactions which fall outside the regular pattern of an account's activity or to identify complex or unusual transactions or transactions without obvious economic purpose or clear legitimate reason. Without such knowledge, the Company shall not be able to discharge its legal obligation to identify and report suspicious transactions to the appropriate bodies.

The constant monitoring of the Clients' accounts and transactions is an imperative element in the effective controlling of the risk of Money Laundering and Terrorist Financing. The monitoring system relies both on automated monitoring and where appropriate, manual monitoring by the staff of the compliance function.

16.2.Procedures:

The procedures and intensity of monitoring accounts and examining transactions are based on the level of risk and, as a minimum, achieve the following:

- (a) Identifying all high risk Clients, as applicable; the Company shall have in place systems or measures and procedures that will enable the Company to produce detailed lists of high risk Clients, so as to facilitate enhanced monitoring of accounts and transactions, as deemed necessary;
- (b) Detecting unusual or suspicious transactions that are inconsistent with the economic profile of the Client for the purposes of further investigation.
- (c) The investigation of unusual or suspicious transactions from the employees who have been appointed for that purpose; the results of the investigations are recorded in a

separate memo and kept in the file of the customer concerned;

- (d) all necessary measures and actions must be taken, based on the investigation findings of point (c), including any internal reporting of suspicious transactions/activities to the MLCO;

(e) Ascertaining the source and origin of funds credited to accounts.

(f) Identifying transactions which, as of their nature, may be associated with money laundering or terrorist financing Transactions executed for the customer are compared and evaluated by the MLCO and staff of the compliance function against:

- The anticipated account's turnover;
- The usual turnover of the activities/operations of the customer;
- The data and information kept for the customer's economic profile.

The Company introduces and implements the use of appropriate and proportionate IT systems, which include:

- adequate automated electronic management information systems which will be capable of supplying the Board of Directors and the MLCO, on a timely basis, all the valid and necessary information for the identification, analysis and effective monitoring of Client accounts and transactions based on the assessed risk for money laundering or terrorist financing purposes, in view of the nature, scale and complexity of the Company's business and the nature and range of the investment services undertaken in the course of that business;
- automated electronic management information systems that may be used to extract data and information that is missing regarding the Client identification and the construction of a Client's economic profile;
- for all accounts, automated electronic management information systems to add up the movement of all related accounts on a consolidated basis and detect unusual or suspicious activities and types of transactions. This can be done by setting limits for a particular type, or category of accounts (e.g. high risk accounts) or transactions (e.g. deposits and withdrawals in cash, transactions that do not seem reasonable based on usual business or commercial terms, significant movement of the account incompatible with the size of the account balance), taking into account

the economic profile of the Client, the country of his origin, the source of the funds, the type of transaction or other risk factors. The Company shall pay particular attention to transactions exceeding the above mentioned limits, which may indicate that a Client might be involved in unusual or suspicious activities.

16.3.Red Flags – Examples:

Examples of Red Flags are:

- Transactions with no discernible purpose or are unnecessarily complex.
- Use of foreign accounts of companies or group of companies with complicated ownership structure which is not justified based on the needs and economic profile of the Client.
- The transactions or the size of the transactions requested by the Client do not comply with his usual practice and business activity.
- Large volume of transactions and/or money deposited or credited into an account when the nature of the Client's business activities would not appear to justify such activity.
- The Business Relationship involves only one transaction or it has a short duration.
- There is no visible justification for a Client using the services of a particular financial organisation. For example the Client is situated far away from the particular financial organisation and in a place where he could be provided services by another financial organisation.
- There are frequent transactions in the same financial instrument without obvious reason and in conditions that appear unusual (churning).
- There are frequent small purchases of a particular financial instrument by a Client who settles in cash, and then the total number of the financial instrument is sold in one transaction with settlement in cash or with the proceeds being transferred, with the Client's instructions, in an account other than his usual account.
- Any transaction the nature, size or frequency appear to be unusual, e.g. cancellation of an order, particularly after the deposit of the consideration.
- Transactions which are not in line with the conditions prevailing in the market, in relation, particularly, with the size of the order and the frequency.

- The settlement of any transaction but mainly large transactions, in cash.
- Settlement of the transaction by a third person which is different than the Client which gave the order.
- Instructions of payment to a third person that does not seem to be related with the instructor.
- Transfer of funds to and from countries or geographical areas which do not apply or they apply inadequately FATF's recommendations on Money Laundering and Terrorist Financing.
- A Client is reluctant to provide complete information when establishes a Business Relationship about the nature and purpose of its business activities, anticipated account activity, prior relationships with financial organisations, names of its officers and directors, or information on its business location. The Client usually provides minimum or misleading information that is difficult or expensive for the financial organisation to verify.
- A Client provides unusual or suspicious identification documents that cannot be readily verified.
- A Client's home/business telephone is disconnected.
- A Client that makes frequent or large transactions and has no record of past or present employment experience.
- Difficulties or delays on the submission of the financial statements or other identification documents, of a Client/legal person.
- A Client who has been introduced by a foreign financial organisation, or by a third person whose countries or geographical areas of origin do not apply or they apply inadequately FATF's recommendations on Money Laundering and Terrorist Financing.
- Shared address for individuals involved in cash transactions, particularly when the address is also a business location and/or does not seem to correspond to the stated occupation (e.g. student, unemployed, self-employed, etc).
- The stated occupation of the Client is not commensurate with the level or size of the executed transactions.
- Financial transactions from non-profit or charitable organisations for which there appears to be no logical economic purpose or in which there appears to be no link between the stated activity of the organisation and the other parties in the transaction.

- Unexplained inconsistencies arising during the process of identifying and verifying the Client (e.g. previous or current country of residence, country of issue of the passport, countries visited according to the passport, documents furnished to confirm name, address and date of birth etc).
- Complex trust or nominee network.

17. DEPOSIT AND WITHDRAWAL REQUIREMENTS

17.1. Deposits:

The Company monitors funding from various funding sources to the accounts of account holders. The Company will NOT accept funds via a third party.

(a) Wire transfer:

In the case of deposit through the means of wire transfer the Company must proceed with Owner Verification procedure which means that it must be satisfied that the Depositor's Details (i.e. name) match those of the account holder. This is achieved with the provision of Deposit Confirmation/Slip (Swift) by the respective client.

(b) Credit/Debit Card:

In the case of deposit via debit/credit card, prior to crediting funds into client's account:

- Client must provide a copy of the front and the back side of the credit card used;
- Client to cover all sensitive information from the front and the back side of the credit card apart from:
 - The cardholder's name,
 - bank of issue and expiry dates,
 - and the first and last 4 digit of the CVV number should be covered at all times.

17.2. Withdrawals

The withdrawal process detailed below is structured so as to make sure that funds are securely sent back to their originating source and beneficiary. The Company does not allow withdrawals to third parties.

Withdrawal Process:

i. The client must complete a withdrawal request containing their correct account information. The said request can be submitted either online through client's portal or manually.

ii. All withdrawal forms whether online or otherwise are submitted to the Company's accounts department for processing. The Accounts Department confirms the account balance, verifies there are no any withdrawal restrictions on the account and then approves the withdrawal request, pending compliance approval.

iii. The Accounts department ensures and verifies that original funds are withdrawn via the same method of deposit and to the originate source.

iv. The Accounts department further checks and examines the withdrawal request against the customer's deposit history so as to ensure there is no suspicious activity and verifies bank account on file

v. Withdrawal requests are approved by compliance are processed by the Accounts Department and funds are released to the client

vi. In case of a red flag or whether a specific withdrawal has been flagged as suspicious, the withdrawal is placed on hold, pending further investigation by the Company's Compliance Officer and compliance staff.

vii. The Company and the Accounts department will work closely with the Compliance Officer and compliance function in general to determine whether further actions are needed and if any relevant regulatory bodies need to be informed.

17.3. Cash Deposits or Withdrawals

The Company neither accepts cash deposits nor disburses cash under any circumstances.

Schedule 2 Table A - Collection of Customer Information

18. INDIVIDUAL IDENTIFICATION

18.1.1.. In relation to a customer who is an individual:

- (a) the customer's name;
- (b) the customer's residential address;
- (c) the customer's date of birth;
- (d) any other name that the customer is known by;
- (e) the customer's country(ies) of citizenship;
- (f) the customer's country(ies) of residence;
- (g) the customer's occupation or business activities;
- (h) the nature of the customer's proposed relationship with the reporting entity - including:
 - the purpose of specific

transactions; or • the expected nature and level of transaction behavior.

- (i) the income or assets available to the customer;
- (j) the customer's source of funds including the origin of funds;
- (k) the customer's financial position;
- (l) the beneficial ownership of the funds used by the customer;
- (m) the beneficiaries of the transactions being facilitated by the reporting entity on behalf of the customer including the destination of funds.

18.1.2. In relation to a customer who is a sole trader:

- (a) The full name of the sole trader as registered under Republic of the Marshall Islands The Office Of The Registrar of Corporations
- (b) The full address of the business or customer's residential address;
- (c) Business License, CT number issued to the business;
- (d) Nature of the business activities conducted by the sole trader;
- (e) Beneficial owners of the business.

18.2.LEGAL PERSON

18.2.1. In relation to a customer who is a company:

- (a) the full name of the company as registered by Office Of The Registrar of Corporations;
- (b) the full address of the company's registered office;
- (c) the full address of the company's principal place of business (if any);
- (d) the Republic of the Marshall Islands The Office Of The Registrar of Corporations , Business License and CT number issued to the company;
- (e) company structure;
- (f) the name of each director of the company;
- (g) the name of the company secretary
- (h) the date upon which the company was registered by Republic of the Marshall Islands The Office Of The Registrar of Corporations;
- (i) the name of any company secretary;
- (j) the nature of the business activities conducted by the company;
- (k) the full name and address of each beneficial owner of the company

18.2.2. In relation to a customer who is a foreign registered Company:

- (a) full name of the foreign company;
 - (b) the full address of the company's registered office and registered agent in Marshall Islands;
 - (c) the full address of the company's principal place of business in Marshall Islands;
 - (d) the company structure;
 - (e) name of each company director and secretary;
 - (f) nature of the business activities conducted by the company:
 - (f)a) in country of registration, formation, incorporation;
 - (f)b) in Marshall Islands;
 - (g) name and address of beneficial owners of the company;
 - (h) the country in which the company was formed, incorporated or registered;
 - (i) whether the company is registered by the relevant foreign registration body and if so, its the company structure;
 - (j) the name of the relevant foreign registration body
 - (k) any identification number issued to the company by the relevant foreign registration body upon the company's formation, incorporation or registration;
 - (l) the date upon which the company was formed, incorporated or registered in its country of formation, incorporation or registration;
 - (m) the full address of the company in its country of formation, incorporation or registration as registered by the relevant foreign registration body.
- 18.2.3. In relation to a customer who is an unregistered foreign Company:
- (a) the full name of the company;
 - (b) full address of the company's registered office and registered agent in Marshall Islands;
 - (c) the full address of the company's principal place of business in Marshall Islands;
 - (d) company structure;
 - (e) name of each company director and secretary;
 - (f) the country in which the company was formed, incorporated or registered;
 - (g) whether the company is registered by the relevant foreign registration body and if so:
 - i. any identification number issued to the company by the relevant foreign registration body upon the company's formation, incorporation m registration;

ii. the full address of the company in its country of formation,
incorporation or registration as registered by the relevant foreign registration body; and

iii. company structure;

(h) the name of the relevant foreign registration body;

(i) the date upon which the company was formed, incorporated or registered in its country of formation, incorporation or registration

(j) the full address of the company's principal place of business in that country; and

(k) the name and address of any beneficial owner of the company.

18.2.4. In relation to a customer who is a partner of a partnership:

(a) the full name of the partnership;

(b) the full business name of the partnership as registered under

(c) Republic of the Marshall Islands The Office Of The Registrar of Corporations ;

(d) the Business' license and VAT number

(e) the country in which the partnership was established;

(f) the full name and residential address of any partner;

(g) the respective share of each partner in the partnership;

(h) the nature of business of the partnership;

(i) the date upon which the partnership was established.

18.2.5. In relation to a customer who is an incorporated association:

(a) the full name of the association as registered under Republic of the Marshall Islands The Office Of The Registrar of Corporations ;

(b) the full address of principal place of administration or registered office (if any) or the residential address of the association's public officer or (if there is no such person) the association's president, secretary or treasurer;

(c) registration number issued by Republic of the Marshall Islands The Office Of The Registrar of Corporations or any unique identifying number issued to the association upon its incorporation;

(d) the full name of the chairman, secretary and treasurer or equivalent officer in each case of the association;

(e) country in which the association was incorporated;

(f) the date upon which the association was incorporated;

(g) the objects of the association;

(h) in respect of any member - the information required to be collected from an individual under the reporting entity's customer identification program in respect of individuals; and

(i) the full business name, if any, of the association.

18.2.6. In relation to a customer who is a registered co-operative:

(a) the full name of the co-operative as registered with the Registrar of Cooperatives;

(b) the full address of the co-operatives registered office or principal place of operations (if any) or the residential address of the cooperatives secretary or (if there is no such person) the cooperatives president or treasurer;

(c) any unique identifying number issued to the co-operative upon its registration by the relevant registration body;

(d) the full name of the chairman, secretary and treasurer or equivalent officer in each case of the co-operative;

(e) in respect of any member - the information required to be collected from an individual under the reporting entity's customer identification program in respect of individuals;

(f) the full business name, if any, of the co-operative;

(g) the country or province in which the co-operative is registered;

(h) the date upon which the co-operative was registered;

(i) the objects of the co-operative; and in a certified copy or certified extract of the rules of the co-operative.

18.2.7. In relation to a customer who is a government body:

(a) the full name of the government body;

(b) the full address of the government body's principal place of operations;

(c) whether the government body is an entity or emanation, or established under legislation;

(d) information about the ownership or control of a government body that is an entity or emanation or established under legislation of a foreign country; and

(e) the name of any legislation under which the government body was

Established

19. CATEGORIES OF OFFICIAL DOCUMENTS

19.1. CATEGORY A - Official Documents acceptable

19.2. CATEGORY B - A written reference confirming the customer's full name, date of birth and occupation, from one of the following acceptable referees:

<p>CATEGORY A Official Documents</p> <ul style="list-style-type: none"> • Current passport (all countries) • Marriage certificate • Educational institution • Current driver's license (all certificates countries) • Student card or registration document for an educational institution (such as a primary or high school) • Government identification documents • Government health card • Certificate of Christening/Baptism • Citizenship certificate • License or permit issued by the Government of the Republic of Marshall Islands • Birth certificate • Employment identification • Employment records • Public utilities record (such as an electricity) • Employment pay slips • Other official records from the Government of the Republic of Marshall Islands • Current records of membership of professional trade organisation • An existing customer who is known favourably to the reporting entity (verified by a reporting entity signature) • Records from a bank (including bank or credit cards such as Visa, Diners, Club, Master Card, an American Express; or statements for an account or credit card) • An existing customer with a bank who has held account with the bank for more than two years • Foreign pensioner's card • Superannuation or provident fund membership card • Marshall Islands work permit • Firearms license • Mortgage or other security document over the customer's property 	<p>CATEGORY B</p> <p>A written reference confirming the customer's full name, date of birth and occupation, from one of the following acceptable referees:</p> <ul style="list-style-type: none"> • A senior bank employee • An officer in charge of a bank agency • A bank manager • A lawyer or legal practitioner • A registered medical practitioner or dentist • A qualified pharmacist • A Magistrate of a District Court • A landlord of a rented premises where the person lives • A public servant • A Customs or Immigration officer • A Magistrate • A local level Government Councillor • A Notary • A Headmaster of a primary or secondary school • A serving Member of Parliament • A Police officer or commander • An accountant who is a member of an association of accountants • An employee of a reporting entity or cash dealer • A statutory declaration from a
---	--