

ANTI-MONEY LAUNDERING (AML 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 and etc.) into money or investments that appear to be legitimate. Such activity is used so that the illegal source of money and other material values cannot be traced. The nature of the services and products offered by the financial services industry (namely managing, controlling and possessing money and property belonging to others) means that it is vulnerable to abuse by money launderers.

COMMITMENT

Aristrex respects the privacy of any user that accesses its site(s); therefore, the Firm is committed in taking all reasonable steps in safeguarding any existing or prospective clients, applicants and visitors.

APPLICATION

In order to open an account with Aristrex, you must first complete and send an application form by completing the required information. By completing the application form you are requested to disclose private information in order to enable the Firm to evaluate your application and comply with relevant rules and regulations. This information may also be used by the Firm to inform you regarding its services. Moreover, information about you may also be collected by any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our site, subscribe to our service or any other activities carried out on our website or any connected applications.

POLICY STATEMENT AND PRINCIPLES

Aristrex Limited (referred as "Aristrex") has adopted a programme that complies with the AML/CTF Act. As part of this process, you will need to provide evidence of identification.

SCOPE OF POLICY

- This policy applies to all Aristrex officers, employees, appointed producers and products and services offered by Aristrex.
- All business units and locations within Aristrex will cooperate to create a cohesive effort in the fight against money laundering. Each business unit and location has implemented risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the International Anti Money Laundering law.
- All efforts exerted will be documented and retained in accordance with the Anti-Money laundering law. The AML Compliance Committee is responsible for initiating Suspicious Activity Reports ("SARs") or other required reporting to the appropriate law enforcement or regulatory agencies. Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the AML Compliance Committee.

POLICY

- It is the policy of Aristrex to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.
- Aristrex is committed to AML compliance in accordance with applicable law and requires its officers, employees and appointed producers to adhere to these standards in preventing the use of its products and services for money laundering purposes.

CUSTOMER IDENTIFICATION PROGRAM

- Aristrex will provide notice to customers that it is requesting information from them to verify their identities, as required by applicable law.

DISCLOSURE OF CUSTOMER INFORMATION

- Aristrex may share customer personal information with any member of our group, which means any subsidiaries, ultimate holding companies and its respective subsidiaries may receive such information. We may also share your information with certain third parties including business partners, suppliers and sub-contractors and advertisers. In the event that Aristrex discloses information to business parties, for instance, card processing companies or banks, in order to affect the services requested by the clients; such third parties may store your information in order to comply with their legal and other obligations.

INFORMATION WE MAY COLLECT ABOUT YOU

- Tracking systems used on the Firm's site(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits etc; this information is obtained in order to improve the content of the Firm's site(s) and may also be used by Aristrex to contact you, through an appropriate mean, and provide you with any information the Firm believes to be useful.
- With regards to each of your visits to our site, we may, automatically collect information including internet protocol (IP) address, login information, browser type and version, time zone, phone numbers used to call our customer service number. We may receive information about you from third parties, for instance business partners, sub-contractors, advertising networks, analytics providers, search information providers, credit reference agencies.

VERIFYING INFORMATION

- In verifying customer identity, appointed producers shall review photo identification. Aristrex shall not attempt to determine whether the document that the customer has provided for identification has been validly issued.
- For verification purposes, Aristrex shall rely on a government-issued identification to establish a customer's identity. Aristrex however, will analyse the information provided to determine if there are any logical inconsistencies in the information obtained.

- Aristrex will document its verification, including all identifying information provided by the customer, the methods used and results of the verification, including but not limited to sign-off by the appointed producer of matching photo identification.

CUSTOMERS WHO REFUSE TO PROVIDE INFORMATION

- If a customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, the appointed agent shall notify their New Business team. Aristrex will decline the application and notify the AML Compliance Committee.

MONITORING AND REPORTING SUSPICIOUS ACTIVITY

- Aristrex collects and verifies identification data of the Client and also logs and tracks itemized statements of all transactions carried out by the Client.
- If Aristrex tracks suspicious transactions of the clients and transactions executed under nonstandard conditions. The Company performs its anti-money laundering compliance on the basis of AML FATF recommendations.
- Aristrex neither accepts cash deposits nor disburses cash under any circumstances.
- Aristrex reserves the right to refuse to process a transaction at any stage, when it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law Aristrex is not obligated to inform the client that they were reported to the corresponding governing bodies due to client's suspicious activity.

SUSPICIOUS ACTIVITIES

- The customer exhibits unusual concern regarding the firm's compliance with government reporting requirements and the firm's AML policies, particularly with respect to his or her identity, type of business and assets, or is reluctant or refuses to reveal any information concerning business activities, or furnishes unusual or suspect identification or business documents.
- The customer wishes to engage in transactions that lack business sense or apparent investment strategy, or are inconsistent with the customer's stated business strategy.
- The information provided by the customer that identifies a legitimate source for funds is false, misleading, or substantially incorrect.
- Upon request, the customer refuses to identify or fails to indicate any legitimate source for his or her funds and other assets.
- The customer (or a person publicly associated with the customer) has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The customer exhibits a lack of concern regarding risks, commissions, or other transaction costs.
- The customer appears to be acting as an agent for an undisclosed principal, but declines or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity.

- The customer has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry.
- The customer attempts to make frequent or large deposits of currency, insists on dealing only in cash equivalents, or asks for exemptions from the firm's policies relating to the deposit of cash and cash equivalents.
- The customer engages in transactions involving cash or cash equivalents or other monetary instruments that appear to be structured to avoid the \$10,000 government reporting requirements, especially if the cash or monetary instruments are in an amount just below reporting or recording thresholds.
- For no apparent reason, the customer has multiple accounts under a single name or multiple names, with a large number of inter-account or third-party transfers.
- The customer is from, or has accounts in, a country identified as a non-cooperative country or territory by the Financial Action Task Force.
- The customer's account has unexplained or sudden extensive wire activity, especially in accounts that had little or no previous activity.
- The customer's account shows numerous currency or cashier's check transactions aggregating to significant sums.
- The customer's account has a large number of wire transfers to unrelated third parties inconsistent with the customer's legitimate business purpose.
- The customer's account has wire transfers that have no apparent business purpose to or from a country identified as money laundering risk or a bank secrecy haven.
- The customer's account indicates large or frequent wire transfers, immediately withdrawn by check or debit card without any apparent business purpose.
- The customer makes a funds deposit followed by an immediate request that the money be wired out or transferred to a third party, or to another firm, without any apparent business purpose.
- The customer makes a funds deposit for the purpose of purchasing a long-term investment followed shortly thereafter by a request to liquidate the position and transfer of the proceeds out of the account.
- The customer engages in excessive journal entries between unrelated accounts without any apparent business purpose.
- The customer requests that a transaction be processed in such a manner to avoid the firm's normal documentation requirements.
- The customer, for no apparent reason or in conjunction with other red flags, engages in transactions involving certain types of securities, such as penny stocks, and bearer bonds, which although legitimate, have been used in connection with fraudulent schemes and money laundering activity.

(Such transactions may warrant further due diligence to ensure the legitimacy of the customer's activity.)

- The customer's account shows an unexplained high level of account activity with very low levels of securities transactions.

If the appointed producer:

- Exhibits a dramatic or unexpected increase in sales (particularly of single premium contacts)
- Has consistently high activity in single premium contracts in excess of company averages
- Exhibits a sudden change in lifestyle
- Requests client documentation be delivered to the agent

OUR COMPLIANCE REGIME

- Aristrex implemented a compliance regime, as laws require from financial institutions, including appointment of a compliance officer, preparation of policies and procedures, periodic review of their effectiveness, and ongoing compliance training of our staff.
- Aristrex is committed to regularly update its electronic system for inspection of suspicious transactions and for verification of client identification records, in accordance with any new regulations as they are promulgated, as well as providing training for its employees on enhancements to anti-money laundering procedures that may be required by new regulations.

COOKIES

- A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Aristrex uses cookies on its site(s).
- Aristrex uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's 'Help' file.
- Aristrex sets a persistent cookie for statistical purposes. Persistent cookies also enable the Firm to track and target the location and the interests of users that access the Aristrex site(s) and to enhance the experience of services offered.
- If you reject cookies, you may still use the Aristrex site(s), but you will not be able to use Aristrex Direct to submit your application form. Some of the Aristrex business partners use cookies on the Firm's site(s); Aristrex has no access or control over these cookies.