

Fight against money laundering

* VStarSoho does not tolerate money laundering and supports the fight against money laundering.*

* VStarSoho has policies designed to deter people from laundering money.*

What is money laundering?

Money laundering is not just an attempt to hide money received from the sale of drugs. Rather, money laundering includes any transaction or series of transactions designed to conceal or disguise the nature or source of proceeds derived from illegal activities, including drug trafficking, terrorism, organized crime, fraud, and many other crimes. Money laundering occurs when any funds obtained from illegal/criminal activities are moved through the financial system. It is moved in such a way as to give the impression that the funds came from legitimate sources.

*There is no specific method of money laundering; however, there are usually three stages during which individuals involved in money laundering can make numerous transactions that can alert the financial institution to criminal activity.:

- * First, placement - physical disposal of funds obtained as a result of illegal activities; in other words, cash or cash equivalents are placed in the financial system.
- * Second, stratification-separating illicit proceeds from their source by creating complex layers of financial transactions designed to hide the audit trail and ensure anonymity; in other words, money is transferred or moved to other accounts (for example, futures accounts) through a series of financial transactions designed to conceal the origin of money (for example, performing transactions with little or no financial risk, or transferring account balances to other accounts).
- * Third, and finally, integration-ensuring the obvious legitimacy of wealth obtained by criminal means; in other words, funds are re-introduced into the economy, so that it seems that the funds have arrived from legitimate sources (for example, closing a futures account and transferring funds to a bank account).

Trading accounts are one of the tools that can be used to launder illegal funds or hide the true owner of these funds. In particular, a trading account can be used to perform financial transactions that help hide the origin of funds. VStarSoho directs withdrawals back to the original money transfer source as a preventative measure.

The international fight against money laundering requires financial service institutions to be aware of potential money laundering abuses that may occur in customer accounts and implement the following measures:

a strict compliance program to prevent, detect, and report potential suspicious activity..

Identify suspicious activity

At the moment, there is no clear regulatory guidance on

what counts as "suspicious activity". Determining whether a particular transaction or series of transactions is suspicious will necessarily depend on the client and the specific transaction(s) compared to the client's normal business activities. Unusual or questionable transactions, sometimes referred to as "red flags", may include those that do not appear to have a reasonable economic basis or a recognizable strategy based on what the firm knows about the client. Suspicious activity can occur either at the very beginning of the relationship with the client, or long after the relationship has been established.

Know Your Customers ("KYC")

The Company has separate account opening procedures that are followed when opening new accounts. These procedures should be read in conjunction with the "Potential Client Verification and Anti-money laundering Measures" section of these Procedures. However, in addition to these new account opening procedures, each Associated Person must be familiar with the identity of their client. The following are the factors that should be considered when performing the "Know Your Customer" duty. The Compliance Officer will also be responsible for reviewing all new accounts and conducting an annual review of all accounts, taking into account the following factors:

- * Whether the customer is an individual, intermediary, public, private or domestic corporation, financial or non-financial institution, or a regulated person or organization.
- * Whether the customer was an existing customer in the past for a significant period of time.
- * How the client became a client of the Company (for example, the client is personally known

- * Whether the client's home country is a member of the Financial Action Task Force on Money Laundering ("FATF").

"Red flags" — indicators at the stage of opening an account:

Below is a list of potential indicators of suspicious activity, which can be used to identify the client's bank account.

Although not exhaustive, it may indicate money laundering.:

- * The client shows unusual concerns about the firm's compliance with government reporting requirements, especially regarding his or her identity, type of business and assets, or is reluctant or refuses to disclose any information related to business activities, or provides unusual or suspicious information or business activities documents;
- * The client wants to participate in transactions that do not have enough business experience.

* The Client

(or a person publicly associated with the client) has a questionable past or is the subject of news reports indicating possible criminal, civil, or regulatory violations.

- * The Client appears to be acting as an agent of another organization but refuses, evades, or is unwilling, without legitimate commercial reasons, to provide any information in response to questions about this organization.;
- * The client has difficulty describing the nature of their business or lacks general knowledge of their industry.;
- * Information provided by the client that identifies a legitimate source of funds, is false, misleading, or substantially incorrect; and
- * Upon request, the client refuses to indicate or does not indicate any legitimate source of their funds and other assets.

Customer verification, anti-money laundering measures

The Company has procedures in place to prevent and detect

money laundering. As part of these procedures, the Company has also developed detailed procedures for verifying new customers. Such procedures are discussed in more detail in the context of combating money laundering. The Compliance Officer is responsible for approving all new accounts to ensure that no account is subject to restriction or blocking before opening.

* All new invoices must be reviewed and approved by the Compliance Officer before they are opened. It is essential that all necessary information is obtained and that all account holders and primary account holders are identified and matched to the lists of terrorists and suspected terrorists published by the Office of Foreign Assets Control ("OFAC") and other lists published by the Financial Administration. Target Action Group ("FATF") Anti-Money Laundering program. The Compliance Officer is responsible for ensuring that the Company complies with anti-money laundering procedures, which are set out in a separate section entitled "Anti-Money Laundering Compliance Program".

VStarSoho will receive the following information from all potential customers:

* For individuals:*

- * A copy of a government issued, expired identity card confirming citizenship or place of residence and with a photo (such as a driver's license, passport, alien registration card or similar identity card).
- * Bank card (the first 6 digits, the last 4, the expiration date and the owner's name should be visible on the front side of the card. ~~Side by side~~ ~~close~~ the CVV code)
- * A valid recent official utility bill with

specify the user's name and address (water, gas, electricity, phone, bank statement, etc.) issued within the last three months.

* For non-physical persons / Corporate or institutional:*

1. Memorandum and Articles of Association (certified original)
2. Certificate of registered address (certified original)
3. Certificate of Directors and Shareholders (certified original)
4. Certificate of Registration (certified original)
5. The account opening form is completed, signed and initialed on each page Completed protocol, signed and initialed on each page
6. Financial position of the company-audited financial statements for the last 2 years
7. Complete package of documents: passport/ID card, copy of credit card and proof of address (for example, utility bill) of the authorized person.
8. Passport/identity card, proof of address (for example, utility bills) of all shareholders of the Company.

VStarSoho will close the account if:

- * The potential customer's identity cannot be verified.
- * There are any doubts about the legality of the source or use of the client's funds.
- * The Client refuses to provide the required information.
- * The information provided appears to be false or suspicious.
- * The information is contradictory and cannot be explained after additional requests.

Deposits and withdrawals

* Withdrawal Orders: Providing documentation or

any other type of Client authentication that may be required from time to time under the Anti-Money Laundering (AML) regulations of credit card companies and VStarSoho is a prerequisite before executing a withdrawal order..

- * In accordance with the rules of credit card companies card deposits can be refunded to the same credit card upon withdrawal. Withdrawals to a bank account where the initial deposits were made using credit cards will be made back to the credit card or bank account at the company's discretion. Withdrawal of funds to a bank account may take a longer period of time due to additional security procedures and documentation from the Client.
- * Difference in credit card deposits: If you choose a base account currency other than US dollars, your credit card may be charged amounts that may differ slightly from the original amount you deposited to the account due to the exchange rates and fees of ~~credit cards~~ ~~credit cards~~ base currency. You hereby acknowledge that such changes may take place and hereby confirm that you will not attempt to object or request a refund. Please note that if you use the US dollar as the base currency of the account for this phenomenon, you can

avoid..

- * Bank transfers: When making a deposit via bank transfer, as required by the anti-money laundering regulations, you must use only one bank account that is opened in your country of residence and opened in your name. An authentic SWIFT confirmation or transfer confirmation showing the origin of the funds must be sent to the VStarSoho address. Failure to provide such SWIFT / confirmation may result in a refund of the deposited amount, which will make it impossible to deposit such pending amounts to your VStarSoho account. Any withdrawal of funds from your VStarSoho account to a bank account can only be returned to the same bank account from which the funds were originally received..
- * Alternative payment methods (e-wallets; money transfer services; Internet payment providers, etc.): when depositing funds using funds other than credit cards and credit cards. You agree and acknowledge that you are required to comply with the terms and conditions of such service, including, but not limited to, fees and other restrictions. VStarSoho, at its sole discretion, may withdraw funds to a different facility than the one used for the initial deposit, in accordance with the Company's rules and anti-money laundering regulations.
- * The company does not accept cash deposits.

These guidelines were implemented to protect VStarSoho and its customers.

