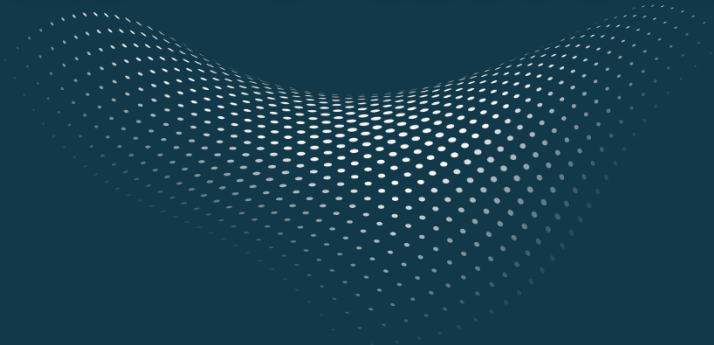


LP PRIME



AML & KYC POLICY

AML Policy

Logan Capital (Pty) Ltd is operating under the trading name LP Prime, is an Authorised Financial Services Provider registered and existing in the Republic of South Africa under registration number 2017/657344/07 and regulated by the Financial Sector Conduct Authority under the Financial Intermediary and Services Act 37 of 2002 ("FAIS").

Logan Capital (Pty) Ltd is an Accountable Institution as defined in the Financial Intelligence Centre Act, 38 of 2001 as amended.

Logan Capital (Pty) Ltd has a Risk Management and Compliance Programme (RMCP) in place.

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

ANTI-MONEY LAUNDERING INSTRUMENTS

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

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

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

LP Prime does not open deposit accounts and does not accept or withdraw funds in the form of cash. All monetary transactions are performed through cashless settlements, while strict document recording of all interbank transactions is carried out. Besides, the Company reserves the right to suspend the

transmission of funds if there are any suspicions that operations have been carried out for criminal purposes. In such cases, the Company is obliged to report any suspicious transactions and to provide the relevant information to the corresponding governmental supervisory authorities regarding such operations without notifying the clients.

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

KYC Policy

The objective of KYC policy is to prevent Logan Capital (Pty) Ltd from being used, intentionally or unintentionally, by criminal elements for money laundering activities or terrorist financing activities. KYC procedures shall also enable the Logan Capital (Pty) Ltd to know and understand its Customers and its financial dealings better which in turn will help Logan Capital (Pty) Ltd to manage its risks prudently. Any fraudulent activity will be documented and all related accounts to it will be immediately closed. Logan Capital (Pty) Ltd will report any fraudulent activity to the Financial Intelligence Centre in compliance with LP Prime' Risk Management and Compliance Programme.

PREVENTION:

1. To ensure the integrity of sensitive data Logan Capital (Pty) Ltd obtains from the Customer's account information and the transactions they make.
2. To prevent criminal elements from using Logan Capital (Pty) Ltd for money laundering activities.
3. To enable Company to know and understand its Customers and their financial dealings better which, in turn, would help the Company to manage risks prudently.
4. To put in place appropriate controls for detection and reporting of suspicious activities in accordance with applicable laws/laid down procedures.
5. To comply with applicable laws and regulatory guidelines.

WHICH DOCUMENTS ARE REQUIRED WHEN A CUSTOMER OPENS AN ACCOUNT?

For individuals:

- ✓ A copy of Customer valid National ID or Passport with the signature page.
- ✓ A copy of a recent Utility Bill in the Customer's or Bank Statement or Residence Certificate all showing Customer's name and address not older than 6 months.
- ✓ Any other documents which the company may deem necessary.

If, for any reason, the client cannot provide us with a recent utility bill during the account opening procedure, he has a thirty-day period to submit the utility bill to the Company. During this period, the account will be considered as a partially verified account and the client is only allowed to make deposits and trading in his account.

In case that the thirty-day period is completed, and the client does not provide the Company with the utility bill, then the account will be closed and any remaining amount in this account will be refunded to the client.

The account is considered fully verified once all the documents are provided to the Company.

For Companies:

- ✓ Certificate of Incorporation
- ✓ Memorandum and Articles of Association
- ✓ Confirmation of Company Address
- ✓ Business plan
- ✓ Resolution of the board of directors to open an account and confer authority on those who will operate it.
- ✓ A search of the file at the Companies Registration Office.
- ✓ List of all Shareholders with 25% or more of voting rights at the Annual General Meeting of the Company.
- ✓ List of all Directors
- ✓ Identification documents of the Directors and Shareholders
- ✓ Proof of Address of Directors and Shareholders
- ✓ Certificate of Good Standing.
- ✓ Certificate of Incumbency.
- ✓ Any other documents which the Company may deem necessary.

Enquiries made by us will extend as far as practicable to identify those who ultimately own and control the company.

If at any later stage, any changes occur in the structure or the ownership status or to any details of the legal person, or any suspicions arise emanating from changes in the nature of the transactions performed by the legal person via its account, then it is imperative that further enquiries should be made for ascertaining the consequences of these changes on the documentation and information held by the Company for the legal person and all additional documentation and information for updating the economic profile of the legal person is collected.

Copies should be certified by notaries, diplomatic officials, lawyer or equivalent independent professionals.

Standards of control vary between different countries and close attention will be paid to the place of origin of the documents and the background against which they are produced.

WHICH DOCUMENTS ARE REQUIRED WHEN A CUSTOMER DEPOSITS FUNDS?

- ✓ A Copy of your credit/debit card, used to make the deposit (front side with only the 6 last digits visible, back side with the CVV covered).
- ✓ Bank statement of the account used to send the deposit having other transactions covered.

If you have any questions, please do not hesitate to contact our customer support: info@lpprime.com

WHEN DOES THE CUSTOMER NEED TO PROVIDE THESE DOCUMENTS?

We highly appreciate you taking the time to provide us with all the necessary documents in the first seven days after first deposit, to avoid any delays in processing your transactions. We require the receipt of all the necessary documents prior to making any transactions to your benefit. Some circumstances may require us to request these documents before allowing any other activities in your account, such as deposits or trades. Please note that if we will not receive the required documents on file, your pending withdrawals will be cancelled and credited back to your trading account. We will notify you on such event via our system.

HOW CAN THE CUSTOMER SEND THESE DOCUMENTS?

Please scan your documents, or take a high-quality digital camera picture, save the images and then upload them in the relevant section of the Client Area in your LP Prime client login area.

The Customer may also send these documents via email to backoffice@lpprime.com

HOW DO I KNOW MY DOCUMENTS ARE SAFE WITH YOU?

Logan Capital (Pty) Ltd holds the security of documentation at highest priority and treats all documents it receives with utmost respect and confidentiality. All files that Logan Capital (Pty) Ltd obtains are fully protected using the highest level possible of encryption at every step of the review process.