

Alantra Capital Markets

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Version dated November 12, 2025

KNOW YOUR CUSTOMER (KYC) POLICY

1. INTRODUCTION

1.1. Alantra Capital Markets (hereinafter - the "Company") applies the "Know Your Customer" (KYC) policy in accordance with international standards and financial industry best practices.

1.2. KYC policy objectives:

- Client identification and risk assessment
- Prevention of money laundering and terrorist financing
- Compliance with regulatory requirements
- Protection of legitimate clients' interests

2. IDENTIFICATION PROCEDURES

2.1. Basic Verification (for all clients):

Required Document	Purpose	Submission Deadline
Identity document (passport)	Identity verification	Upon registration
Contact information	Client communication	Upon registration
Client questionnaire	Risk profiling	Upon registration

2.2. Enhanced Verification (for operations over 250,000 USD):

- Additional documents on income and sources of funds
- Certificate of good standing (if necessary)
- Beneficial ownership documents (for legal entities)

- Additional database verification

3. CLIENT CATEGORIES

3.1. Retail Clients:

- Individuals investing their own funds
- Standard KYC procedures
- Operation size limitations for certain instruments

3.2. Professional Investors:

- Persons with confirmed professional status
- Extended trading capabilities
- Additional qualification verification

3.3. Institutional Clients:

- Legal entities and investment funds
- In-depth ownership structure verification
- Authorized representative verification

4. CLIENT RISK ASSESSMENT

Risk Assessment Factors:

- **Geographic Risk:** Country of residence and business operation
- **Product Risk:** Types of financial instruments used
- **Channel Risk:** Methods of interaction with the Company
- **Client Risk:** Individual client characteristics

4.1. Risk Classification:

Risk Level	Characteristics	Control Measures
Low	Standard operations, low amounts	Basic monitoring
Medium	Increased operation amounts	Enhanced monitoring
High	PEPs, high-risk jurisdictions	Continuous control

5. ONGOING MONITORING

5.1. The Company conducts ongoing monitoring of all client activities to:

- Ensure operations match client profile
- Detect suspicious operations
- Update client information
- Assess changes in risk level

5.2. Review frequency:

- Low risk: annually
- Medium risk: every 6 months
- High risk: quarterly

6. REFUSAL OF SERVICE

6.1. The Company reserves the right to refuse to provide services in the following cases:

- Inability to identify the client
- Provision of false information
- Non-compliance with acceptable risk criteria
- Presence on sanctions lists
- Suspicion of illegal activity

7. INFORMATION UPDATE

7.1. Clients are required to promptly notify the Company of changes in:

- Personal data
- Contact information
- Financial position
- Investment objectives