

Anti Money Laundering Policy

Newcom Ltd. as a financial company is subject to laws and other forms of regulation of anti-money laundering ("AML"), which results in many particular measures, principles and rules that can be seen by applicants for business, clients or partners while dealing with Newcom Ltd. itself, its subsidiaries, branches, subordinated enterprises or affiliates. To show the importance and willingness to comply with legal requirements and so to help achieve the goals of such, Newcom Ltd. has adopted within its structure the policies and measures required by the laws of Wilayah Persekutuan Labuan, which are widely known for being highly severe with subject persons performing within its jurisdiction and requiring them to follow very strict rules. Due to these rules and requirements, Newcom Ltd. focuses on the following:

- Paying a great attention to each client or partner, especially its background, relevant activities and the verification of identity of every applicant for business and all information provided by such;
- Continuously monitoring the activity of clients, partners and their transactions and making sure that they correspond to our knowledge of clients;
- Making and safe keeping records on accounts, transactions, communications with clients and partners, gathered information, concerned internal matters and particular procedures;
- Evaluating possible risk of money laundering while dealing with clients and transactions,
- Applying enhanced rules in case of dealing with suspicious persons, trustees, politically exposed persons, clients from non-reputable jurisdictions and similar;
- Organizing from time to time trainings for employees, especially for those who deal directly with clients and partners;
- Cooperating with responsible AML officers appointed upon employees of Newcom Ltd. and approved by AML authorities;
- Reporting any suspicious activity to the competent AML authority;
- Monitoring changes to relevant legislation, following relevant guidance and adopting new measures, if necessary.

Further, in case it happens that Newcom Ltd. is in any way operating within a jurisdiction, where AML rules require some additional measures, Newcom Ltd. makes sure to meet the additional requirements and to treat relevant matters accordingly.

The goal Newcom Ltd. would like to achieve by adopting a strict AML policy is to prevent itself, its clients, partners and employees from being misused for money laundering, terrorist financing or other financial crime. Newcom Ltd. is fully aware of possible harmful effects and danger to global society, which comes together with the possibility for wrongdoers and criminals to disguise criminal origin of property, transfer, acquire or in any way legalize the ownership of such property.

The most significant consequences of Newcom Ltd. 's AML policy, that may affect either applicants for business, clients or partners, are following:

- Newcom Ltd. has developed a specific application through which any applicant has to enter data and upload documents if new account opening is requested. The application safe keeps all data, documents, records on transactions and trades executed by each client.
- While requesting a new account opening, every applicant has to enter detailed personal data including, but not limited to, full name, address, nationality, date and place of birth, ID number and nature of business in case it is a company. Later on (but still before the account is opened) all this data is verified by requesting applicants to upload a copy of their ID card, another proof of identity and proof of residence (plus proof of existence, list of directors and shareholders in case the applicant is a company). Any applicant must further fill in an investment questionnaire, where employment and income details, history and experience with investment services are asked about.
- All communication between Newcom Ltd. and any client or partner concerning financial services provided by Newcom Ltd. is recorded, regardless of the meaning of communication.
- Deposits to be saved on particular account must come from an account opened with authorized credit institution or a credit card, which is owned and held in the name of the particular owner or applicant for opening account with Newcom Ltd. , otherwise the deposit is rejected. Documents verifying ownership of a card or account are also requested during the account opening process and later on, if necessary.

- New copies of verification documents are always requested from clients prior to the expiration of the current ones.
- In case of continuous suspicious activity, client is asked for explanations and may be even reported to AML authorities.