

Anti-Money Laundering Policy

LAST UPDATED MARCH, 2021

BITA Trading Anti-Money Laundering Policy & Procedures

Objectives

BITA Trading is committed to the highest standards of integrity and compliance and it is the policy of BITA Trading to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable requirements in line with 5th Anti-Money Laundering Directive (Directive EU 2018/843) and applicable local regulations.

Criminals do not want funds to be detected by law enforcement or revenue agencies and aim to convert illegitimate money into assets, which appear legitimate.

Consistent with our Code of Conduct, all employees involved in sales and revenue business transactions must act ethically and strive to prevent money laundering and financing of criminal activities.

Definitions

Money laundering and financing of criminal activities occur in all parts of the world. There are numerous methods ranging from the purchase and sale of goods to complex international financial transactions and such methods evolve constantly. Money laundering and financing of criminal activities can be defined in a number of ways but generally include:

- The conversion, transfer or deposit of proceeds, with intent to conceal or disguise the illicit origin of such proceeds.
- The concealment or disguise of the true nature, source, location, disposition, movement, or rights with respect to or ownership of any proceeds.
- The acquisition, possession or use of proceeds derived from illicit origins or which could lead to financing of criminal activities.

Compliance Person Designation and Duties

BITA Trading has designated Mr. Boris Tatievski as its Anti-Money Laundering Program Compliance Person (AML Compliance Person), with full responsibility for the firm's AML program. The duties of the AML Compliance Person will include monitoring the firm's compliance with AML obligation and ensuring communication and training for employees.

The AML Compliance Person will also ensure that the firm keeps and maintains all of the required AML records. The AML Compliance Person is vested with full responsibility and authority to enforce the firm's AML program. The AML Compliance Person is responsible for giving advice on the interpretation and application of this policy, supporting training and education, and responding to reported concerns.

Requirements

BITA Trading will not accept assets that are factually known or suspected to be the proceeds of criminal activity, nor enter into/maintain business relationship with individuals or entities known or suspected to be involved in criminal activities or that are subject to sanctions applicable to the transaction or relationship in question.

Customer due diligence or Know Your Counterparty (KYC) is essential for all sales and revenue business transactions. All relevant departments shall take measures to gain accurate and complete knowledge of the identity and the business of all contractors, partners or customers, including identifying the ultimate beneficial owner(s) of the counterparty.

All finance and accounting departments shall:

- Verify the identity and bank details of all counterparties before any transaction is made.
- Ensure that no funds are sent to, or received by any person, customer or company on an anonymous basis or to anyone using a fictitious name.
- Be aware of possible risk indicators such as transactions involving high risk or off-shore jurisdictions or subject to sanctions, the absence of personal contacts with the counterparty, deviations compared to normal course of business, complexity of, and any other transaction that appears unusual or seems to lack commercial purpose.
- Managers shall ensure that procedures are in place to assesses and enforce the adequacy and effectiveness of these measures including regular training to staff and consultants.
- Employees shall report any suspicious transaction or concerns about counterparties to their Line Manager and refrain from undertaking any further actions in relation to the suspicious transaction until confirmed legitimate. If confirmed to be a valid concern, it should be reported to the Managing Directors and Legal Department who will determine appropriate checks and measures.

All departments must identify the areas that are vulnerable to money laundering risks and perform an assessment to determine the likelihood and impact of their activities.

Corporate Internal Audit shall audit the related prevention environment to assure its adequacy. Audits shall be conducted periodically based on the risks assessed locally and according to applicable regulations.

Any violation of this Policy may result in a Code of Conduct breach and potential action with relevant

Senior Manager Approval

Senior management has approved this AML compliance program in writing as reasonably designed to achieve and monitor our firm's ongoing compliance with the requirements. This approval is indicated by signature below.

A handwritten signature in black ink, appearing to read "Boris Tatievski". The signature is written in a cursive, somewhat stylized font.

Boris Tatievski, CEO