Measures carried out by «Global Exchange NCO» LLC in the field of anti-money laundering and terrorism financing

To execute the requirements of the Federal law of Russian Federation from August, 7, 2001 No. 115-FZ "On countering the legalization of illegal earnings (money laundering) and the financing of terrorism" and normative acts of Bank of Russia for realization of internal control in the area of counteraction of legalization (laundering) of the profits received by a criminal way in «Global Exchange NCO» LLC (hereinafter referred to as “Global Exchange”) developed and implemented rules of internal control for the purpose of countering of funds received illegally and to financing of terrorism.

A Compliance Officer is appointed at Global Exchange in order to ensure compliance with internal rules on anti-money laundering and terrorism financing, implementing the relevant measures to this end. Presently these duties are performed by the head of the financial monitoring department.

Global Exchange does not establish relationships with non-resident banks or banks with no physical presence in the country in which they are incorporated (shell banks). Global Exchange does not have accounts in the banks, registered in the states (on territories) which are known from international sources not to observe the generally accepted standards on anti-money laundering and terrorism financing.

Under the Federal law No.115-ФЗ "On countering the legalization of illegal earnings (money laundering) and the financing of terrorism" Global Exchange carries out control over the operations of Customers for the following purposes:

- Identify the source of Customer’s funds and understand the purpose and intended nature of the business relationship and, in higher risk situations, obtaining further information.
- Identification of Customers, their representatives and beneficial owners.

Information on the structure of owners of Global Exchange is placed on the section “About us” of the Global Exchange website.