

## **WORLD OF RETAIL AML POLICY**

*Last updated: 28.10.2018*

**1.** Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML Policy”) is designated to prevent and mitigate possible risks of WORLD OF RETAIL being involved in any kind of illegal activity.

This Policy is inalienable part of General Terms & Conditions of WRT Club Card Sale. In terms not regulated by this Policy, the General Terms & Conditions of WRT Club Card Sale shall apply to the relationships that arise hereunder.

**2.** Both international and local regulations require WORLD OF RETAIL to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users.

### **VERIFICATION PROCEDURES**

**3.** One of the international standards for preventing illegal activity is customer due diligence (“CDD”). According to CDD, WORLD OF RETAIL establishes its own verification procedures within the standards of anti-money laundering and “Know Your Customer” frameworks.

**4.** WORLD OF RETAIL identity verification procedure requires the User to provide WORLD OF RETAIL with reliable, independent source documents, data or information (e.g., national ID, international passport, bank statement, utility bill). For such purposes WORLD OF RETAIL reserves the right to collect User’s identification information for the AML Policy purposes.

**5.** WORLD OF RETAIL will take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information will be used and WORLD OF RETAIL reserves the right to investigate certain Users who have been determined to be risky or suspicious.

**6.** WORLD OF RETAIL reserves the right to verify User’s identity in an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (unusual for the particular User). In addition, WORLD OF RETAIL reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

**7.** User’s identification information will be collected, stored, shared and protected strictly in accordance with the WORLD OF RETAIL Privacy Policy and related regulations. More detailed information regarding safe measures, regarding information on how we store, disclose, erase Personal Data, what obligations do You bear and what rights do You have, can be found in the WORLD OF RETAIL Privacy Policy. Detail description of KYC Policy is given in WORLD OF RETAIL Privacy Policy.

**8.** Once the User’s identity has been verified, WORLD OF RETAIL is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

## **COMPLIANCE OFFICERS**

**9.** The Compliance Officers are the persons, duly authorized by WORLD OF RETAIL, whose duty is to ensure the effective implementation and enforcement of the AML Policy. It is the Compliance Officer's responsibility to supervise all aspects of WORLD OF RETAIL anti-money laundering and counter-terrorist financing, including but not limited to:

- 1) *Collecting Users' identification information;*
- 2) *Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations;*
- 3) *Monitoring transactions and investigating any significant deviations from normal activity;*
- 4) *Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs;*
- 5) *Updating risk assessment regularly;*
- 6) *Providing law enforcement bodies and other competent authorities with information as required under the applicable laws and regulations.*

**10.** The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

## **ANTI-MONEY LAUNDERING POLICY**

**11.** WORLD OF RETAIL enforces a strict anti-money laundering policy with zero tolerance for money laundering activities. We define money laundering as any activity that is carried out in an attempt to misrepresent the source of funds actually acquired through illegal processes as funds that were acquired through lawful sources/activities.

**12.** All WORLD OF RETAIL affiliates are obligated to comply with WORLD OF RETAIL anti-money laundering policy and with all applicable anti-money laundering laws. Failure to comply can result in severe consequences such as criminal penalties and heavy fines.

**13.** WORLD OF RETAIL ensures complete compliance with laws pertaining to anti money laundering through its related policy.

**14.** WORLD OF RETAIL implements a range of filtration operations for swift and accurate identification of any financial activities that may constitute or are related to money laundering. This helps ensure a money laundering-free financial operations throughout the WORLD OF RETAIL.

**15.** All WRT Club Card Purchasers acknowledge, undertake and agree to the following terms regarding their use of WRT Club Cards, opening and maintenance of accounts at WORLD OF RETAIL and for all financial transactions as a WORLD OF RETAIL client:

- 1) *The Purchaser will comply (throughout the time as a WORLD OF RETAIL client) with all relevant statutes pertaining to money laundering and proceeds from criminal activities;*
- 2) *WORLD OF RETAIL operates under certain obligations known as "know-your-client" obligations which grant WORLD OF RETAIL the right to implement anti-money laundering procedures to help detect and prevent money laundering activities where money laundering may mean to handle any funds associated with any illegal activity regardless of the location of such activity;*
- 3) *The Purchaser agrees to lend full cooperation to WORLD OF RETAIL with respect to anti-money laundering efforts. This involves providing information that WORLD OF RETAIL*

- requests regarding the client's business details, account usage, financial transactions etc. to help WORLD OF RETAIL perform its duties as dictated by Applicable laws regardless of jurisdiction;*
- 4) *WORLD OF RETAIL reserves the right to delay or stop any funds transfer if there is reason to believe that completing such a transaction may result in the violation of any applicable law or is contrary to acceptable practices;*
  - 5) *WORLD OF RETAIL reserves the right to suspend or terminate any account or freeze the funds in an account if there is reason to believe that the account is being used for activities that are deemed unlawful or fraudulent;*
  - 6) *WORLD OF RETAIL has the right to use client information for the investigation and/or prevention of fraudulent or otherwise illegal activities;*
  - 7) *WORLD OF RETAIL has the right to share client information with:*
    - a. *Investigative agencies or any authorized officers who are helping WORLD OF RETAIL comply with applicable law, including anti-money laundering laws and know-your-client obligations;*
    - b. *Organizations that help WORLD OF RETAIL provide the services it offer its clients;*
    - c. *Government, law enforcement agencies and courts;*
    - d. *Regulatory bodies and financial institutions.*

**16.** Activities that WORLD OF RETAIL considers possible indications of money laundering include:

- 1) *the client showing unusual apprehension or reservations about WORLD OF RETAIL's anti-money laundering policies;*
- 2) *the client's interest in conducting financial transactions which are contrary to good business sense or are inconsistent with the client's business policy;*
- 3) *the client failing to provide legitimate sources for their funds;*
- 4) *the client providing false information regarding the source of their funds;*
- 5) *the client having a history of being the subject of news that is indicative of civil or criminal violations;*
- 6) *the client seems to be acting as a 'front man' for an unrevealed personality or business, and does not satisfactorily respond to requests for identifying this personality or business;*
- 7) *the client not being able to easily describe the nature of his/her industry;*
- 8) *the client frequently makes large deposits and demands dealing in cash equivalents only;*
- 9) *the client maintains multiple accounts and conducts an unusually high number of inter-account or 3rd party transactions;*
- 10) *the client's previously usually inactive account starts receiving a surge of wire activity.*

The above list is by no means an exhaustive list. WORLD OF RETAIL monitors its client and account activity in light of several other red flags and takes appropriate measures to prevent money laundering.