

ANTI-MONEY LAUNDERING POLICY

The objective of the Anti-Money laundering procedures that TW Corp. implements is to ensure that customers engaging in certain activities are identified to a reasonable standard, while minimizing the compliance burden and impact on legitimate customers. TW Corp. is committed to assisting governments to combat the threat of money laundering and the financing of terrorist activities around the world. For this purpose TW Corp. has established a highly sophisticated electronic system. This system documents and verifies client identification records, and tracks and maintains detailed records of all transactions.

TW Corp. carefully tracks suspicious and significant transaction activities, and reports such activities providing timely and comprehensive information to law enforcement bodies. To uphold the integrity of reporting systems and to safeguard businesses, the legislative framework provides legal protection to providers of such information.

In order to minimize the risk of money laundering and financing terrorist activities, TW Corp. neither accepts cash deposits nor disburses cash under any circumstances. TW Corp. reserves the right to refuse to process a transfer at any stage, where it believes the transfer to be connected in any way to money laundering or criminal activity. It is forbidden for TW Corp. to inform customers that they have been reported for suspicious activity.

Identification

For the purpose of complying with Anti-Money Laundering laws, TW Corp. requires two different documents to verify the identity of the customer.

The first document we require is a legal government-issued, identifying document with the picture of the customer on it. It may be a government-issued passport, driver's license (for countries where the driver's license is a primary identification document) or local ID card (no company access cards).

The second document we require is a bill with the customer's own name and actual address on it no older than 3 months. It may be a utility bill, bank statement, or other bill with the name and address of the customer, from an internationally recognizable organization.

Documents in non-Western letters must be translated into English by an official translator; the translation must be stamped and signed by the translator and sent together with the original document with a clear picture of the customer on it.

All customers are checked using World-Check risk intelligence due diligence data, through sanctions lists as well as information available online, including social media and search engines.

Deposits and Withdrawals

TW Corp. requires that all deposits, where the name of the originating customer is present, come from the name of the person matching the name of the customer in our records. Third party payments are not accepted.

In case of big and/or suspicious transactions, TW Corp. requests additional documents confirming the origin of funds, including annual returns, bank statements, etc.

As for withdrawals, money may be withdrawn from the same account, in the same manner in which it was received. For withdrawals where the name of the recipient is present, the name must exactly match the name of the customer in our records. If the deposit was made by wire transfer, funds may be withdrawn only by wire transfer to the same bank and to the same account from which it originated. If the deposit was made by means of electronic currency transfer, funds may be withdrawn only by the means of electronic currency transfer through the same system and to the same account from which it originated.