

Anti-money laundering Policy

Wogenfels Capital has measures to discourage the act of money laundering. These measures consist of:

1. Checking and keeping a record of valid identification information for clients;
2. Verifying that clients are not listed as known or suspected terrorists by cross-referencing their names against lists of such individuals;
3. Informing clients that their information may be utilized to confirm their identity;
4. Monitoring clients' financial transactions closely and rejecting any transactions involving cash, money orders, third-party transactions, exchange house transfers, or Western Union transfers.

What is an anti-money laundering policy?

The term "AML" (Anti-money laundering) is commonly used in the financial and legal sectors to refer to the measures that financial institutions and other regulated entities must implement to prevent, detect, and report money laundering activities. We consider money laundering to be a criminal activity and are actively involved in combating it. We work closely with industry regulators and keep a close eye on any suspicious activity, particularly among our account holders. To prevent money laundering, the first line of defense is a rigorous verification process known as "Know-Your-Client" (KYC).

In order to comply with standard AML regulations, we need the customer to provide us with certain documents, including:

1. Proof of Identity: a legible copy of both sides of a government-issued identification document, such as a valid passport or driver's license.
2. Proof of Address: an official document issued within the past three months that clearly shows the customer's name and address, such as a utility bill (water, electricity, or landline) or a bank statement.
3. Both sides of the bank card used for the transaction: for security reasons, only the final four digits of the card must be visible, and the client may also conceal the CVV code.
4. A Deposit Declaration form.

Please be aware that regulatory requirements may vary in certain countries, which could result in the need for additional documentation.

Money Laundering usually follows three stages:

Firstly, cash or its equivalents are introduced into the financial system. Secondly, the money is then moved through a series of financial transactions to conceal its origin, such as by executing trades with little to no financial risk, or transferring account balances to other accounts. Finally, the funds are reintroduced into the economy in a way that makes it appear they came from legitimate sources. One means of laundering illicit funds or hiding the true owner of the funds is by using trading accounts. These accounts can execute financial transactions that aid in obscuring the funds' origins. As a preventive measure, we return fund withdrawals to the original source of remittance. To comply with international anti-money laundering regulations, financial institutions must be aware of the potential for money laundering abuses to occur in customer accounts and have a compliance program in place to detect, deter, and report suspicious activity. These guidelines are in place to protect our clients.

What is Money Laundering?

Money laundering involves concealing illegally obtained funds to make them appear legal. Our company strictly abides by the law that prohibits us, our staff, or representatives from knowingly participating in any activities remotely associated with money laundering. Our anti-money laundering policies not only enhance investor protection and client security, but also provide secure payment processes.

Monitoring

We have a strict policy of not accepting payments from third parties. All deposits must be made under the account holder's name and match the documents submitted during the KYC verification process. As part of our AML regulatory policies, any funds withdrawn must be returned to the exact source from which they were received. This means that if you deposited funds via a bank transfer, your withdrawal will be sent back to that same account. Similarly, if you deposited funds using a credit card, your withdrawal will be sent back to that same credit card. We do not allow cash deposits or cash withdrawals under any circumstances.

Reporting

We are obligated by AML regulations to closely monitor and track any transactions that may be deemed suspicious, and to report any such activities to law enforcement authorities. We retain the right to refuse any transfer at any point if we suspect that the transaction may be connected to criminal activity or money laundering. The law does not allow us to disclose to customers any reports that we may submit to law

enforcement agencies regarding suspicious activity.

Feel free to reach out to us if you have any inquiries, concerns, or need further explanation on any matter.