



# **AML Program of Infinity Stream Money Laundering**

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## What is the money laundering?

Money laundering is process of introducing illegally received funds to legal, economic or financial circulation. Besides, purchasing, storage, or two-way deals and also any attempts of concealment or masking of the true owner, a source or origin of a monetary instrument are considered as money laundering too.

## Why Infinity Stream Limited performs the AML Policy?

Like the company, performs the international payment and commercial transactions **Infinity Stream** is obliged to observe regulatory requirements and to perform measures for safeguard against fraud, money laundering and financing of terrorist activity. Our policy in the space of anti-money laundering was created and constructed so that to have an opportunity to prevent money laundering according to requirements of the local legislation in the space of anti money laundering, which includes need to have the adequate systems and mechanisms of control for the purpose of the risk reduction of use by the company of illegally received funds.

**Infinity Stream** has all necessary mechanisms of control and procedures of identification, warning and informing on suspicious activity. To conform to requirements of the local and international legislation, including for the purpose of observance of global sanctions, we under watching accounts of our customers regarding compliance to their state sanctions lists. Besides, we can ask you to provide us documentation to help us to confirm your personality or for the business checking purpose. **Infinity Stream** adhered and will adhere to all applicable laws and regulations in all countries where we performs our activity, or does our business.

**Infinity Stream** developed policy and strategy of anti money laundering and is ready to

support constantly this policy and strategy in an effective status at doing all transactions with the clients.

**Infinity Stream** implements the AML Policy in full compliance to the legislation and takes the following steps:

### **1.AML employee**

Has been appointed the AML-employee of the company who coordinates all measures which are perform for prevention of money laundering and provides implementation in daily activity of **Infinity Stream** of the general concept of risk reduction.

To this employee has been assigned the task in course of questions of anti money laundering and the related financial crimes. In this regard was provided the wide range of powers within our AML Policy to it. In particular, have been provided unlimited access to all business data, to all data's, databases and the systems of the website to which he will consider necessary to get access for the purpose of high-quality and effective implementation of the tasks identification of the facts of suspicious activity.

This employee of our company bears personal responsibility for creation, support and effective functioning of all **Infinity Stream** programs directed to anti money laundering for the purpose of identification, assessment, monitoring and risk management, associated with money laundering, suspicious activity, terrorism financing, financial crimes and fraud.

### **2 .Justified Risk**

Has been developed and implemented in activity of **Infinity Stream** the Justified Risk program which purpose is assessment of level of risks getting of this or that transaction into the list of the transactions which are perhaps performs with violation of the principles of anti money laundering or perhaps associated with risk of financing of terrorism. The Justified Risk program is created for exact and operational assessment of risk level

which can arise in interaction with this or that client. Specialists of **Infinity Stream**, whose duty assessment of similar risks enters, apply this program that making decision on continuation or the termination cooperation was carried out most quickly and on the principles of objectivism and justice. The Justified Risk program also determines the level of validity of interaction and creates the exact and informed recommendations about performing transactions with each client.

Using the Justified Risk program, **Infinity Stream** performs constant risk analysis of anti money laundering for assessment of level of influence of this risk, in view of clients of the company, in view of the the geographic location of points of risk and also undertakes the appropriate measures of precaution, based on results of such analysis.

### 3. KYC

Know Your Client (KYC) program has been developed and implemented in activity of **Infinity Stream** which purpose is appropriate check and identification of clients and also observance of the procedures provided by the Justified Risk program.

The Know Your Client program was implemented in all business directions and includes not only knowledge of clients with whom **Infinity Stream** concluded deals, or concluded the single contract, or cooperates as the long-term business relations or to which provides services, but also and the clients having certain privileges in our company.

The procedure of program implementation includes strict requirements to identification of the client, name checking, constant control and regular monitoring of all existing business relations and the performed financial transactions and operations.

We inquire KYC verification only in special cases.

### 4. Secure Bank

The Secure Bank program has been developed and implemented in activity which purpose of creating was an achievement of due level of precautionary measures and implementation of constant control on all financial business activity.

This program provides the strides directed to receiving by all lawful ways of sufficient information on bank of the client completely to understand his priorities and his reputation, on professional assessment of level and the fact of observance by the corresponding contractor of the client of all instructions and provisions regulating anti money laundering. Besides, the Secure Bank program helps to exercise control of transactions which can be regarded as the actions promoting terrorism financing and also helps to exercise control of suspicious activity with use of doubtful banks.

In case of identification of the fact of use by the client of the banks of doubtful reputation entering the list of the organizations which can render financing of the terrorist organizations or which were noticed in suspicious activity, or entering sanctions lists and also applying the Safe Bank program and using ways and control methods and filtrations of bank transactions regarding existence of the imposed embargo of transactions with certain contractors, **Infinity Stream** will not maintain business relations with clients who use in their activity banks with doubtful reputation or who were noticed in suspicious activity.

## **5.Sanctions and Embargo List**

The Sanctions and Embargo List program which purpose of creation was a control of process selection of new clients and of already existing clients and also control of implementation requirements for detection of the transactions contradicting sanctions lists and embargo before these deals are concluded by us is developed and implemented in activity.

The absence in all sanctions lists and the imposed embargoes of data of the client or the contractors affiliated with it is an obligatory circumstance for continuation of effective cooperation of any client with **Infinity Stream**. We will constantly perform an inspection on absence of any client in the above-stated sources and we will not support business relations with clients who appeared in sanctions lists and the imposed embargoes.

## **6. Program of training and instructing**

Has been developed and implemented in activity the program of training and instructing of all staff of the company concerning the financial transactions performed by the company concerning anti money laundering and financing of terrorism.

The special emphasis on instructing and training according to this program is made on those staff of the company to whose duties processing of transactions and also initiation and establishment of business relations Between the company and clients belongs.

The program of training and instructing is tied to the real situation of a situation in business for guaranteeing that circumstance that the staff of the company has complete idea of what main ways and methods of money laundering which can take place in business exist. The program of training and instructing also includes the set of the general duties following from applying of standard and legal and internal requirements and the related daily duties of personnel of the company which have to be observed by them in everyday life and also application of electronic and investigative typology which will help them with recognition and classification of certain actions as money laundering or criminal financial acts.

## **7. Honest Technologies**

Has been developed and implemented in activity the Honest Technologies program which task expert assessment, monitoring and approval of new business products and the services provided by our company enters.

**Infinity Stream** introduced a package of measures of safety and the constant control directed to that in every possible way and effectively to interfere with that our new business products became the tool or were indirectly used for money laundering or financing of terrorism and also to interfere with that use and usage of our new business products and services directly or indirectly promoted anonymity of the financial transactions or operations performed by the client.

### **What will occur in case of identification of our AML Policy violation?**

The **Infinity Stream** company is obliged to refuse provision of services or has to stop any business relations if we are not able to create regarding the special cases, necessary and sufficient reasonable confidence that we know the true identity of the client or if the business or formal requirements concerning identification of the client to them are not executed properly and according to our AML policy in case us the corresponding inquiries to this client are initiated.

**Infinity Stream** does not accept assets on which we have information that these assets are known or presumably known as income gained from criminal activity.

**Infinity Stream** does not support relationship with the persons known or presumably known as the persons concerning the organization of terrorist or criminal activity or being members of the above-stated organizations or which are in lists of sanctions and also with the persons which were included in certain lists of sanctions and the imposed embargoes.

### **The information and transaction safety**

**Infinity Stream** provides confidentiality and safety of your personal information according to the international acts.