

AML/CTF STATEMENT

Angra HK Limited (hereinafter referred to as "Angra" or "the Company") is a money services operator (MSO), established in Hong Kong under the Companies Ordinance, Chapter 32 of the Laws of Hong Kong, on April 15th 2013 and having its registered address at Room 4, 1/F, Kam Fai Building, 128-132 Yee Kuk Street, Sham Shui Po, Kowloon, Hong Kong, with the registration number 1891685.

Angra is subject to supervision by the Hong Kong Customs and Excise Department (HKCED). Angra is committed to the highest standards of integrity in the conduct of its business practices, as well as to all the relevant Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) legislations within Hong Kong and abroad.

It is the policy of Angra to detect, mitigate the risks and actively pursue the prevention of money laundering and any activity that facilitates money laundering (ML) and the funding of terrorist (TF) or criminal activities, as specified under Part 2 and 3 of Schedule 2 to the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (AMLO). Furthermore, the Company is required by section 19(3) of the AMLO to establish and maintain effective procedures consistent with the AMLO for the purpose of carrying out the duties under sections 3, 4, 5, 9, 10 and 15 of Schedule 2.

The following statement has been adopted, to supplement the terms and conditions governing the operation of products and services offered to customers and to familiarize them with Angra's internal policy.

This AML/CTF policy adopts a Risk-Based Approach (RBA) and the manual has been compiled for the use of all Employees at all levels within Angra to guide and aid them in their compliance with the regulatory requirements imposed by the Company's business model and MSO license. The Compliance Officer / Money Laundering Reporting Officer (CO/MLRO), who is aptly qualified, is responsible for the implementation and updating of the policies and procedures contained within this document, as well as reporting to management and to local authorities. The CO/MLRO reports to the Board of Directors which has oversight of all processes, procedures and decisions of the Company.

This program, localized and customized accordingly, includes, but is not limited to:

- Effective controls, such as an up-to-date and constructive AML/CTF compliance program, three lines of defense, senior management oversight, audit function, Know Your Employee procedures with staff screening and training, using the JFIU-outlined approach to

STRs.

- AML/CFT, Customer Due Diligence & Know Your Customer policies and guidelines for the identification and verification of the identity of Angra's customers, including where applicable their respective beneficial owners and proxy holders, and the enhanced due diligence measures applied for PEPs, their relatives, and close associates, as well as for other high-risk clients;
- The careful and meticulous record-keeping, and the retention of customer and transaction records for at least five (5) years after the termination of the business relationship with customers;
- The establishment of a framework to monitor, detect and prevent potential bribery and corruption in accordance with best international standards and Angra's Anti-Bribery and Corruption policy;
- The development of systems and processes to monitor customer transactions and subsequent reporting to the competent regulatory authorities where required;
- The adoption of policies and procedures, not to process or engage in any activity for, on behalf of, or for the benefit of, any individual, entity or organization subject to primary legislation governing AML/CTF in Hong Kong or other applicable sanctions regime, and to apply enhanced due diligence regarding financial institutions or territories which may be connected or controlled by terrorist organizations targeted by these legislations, and perform appropriate scrutiny of payment transfers to/from these financial institutions or territories;

In accordance with the organization's AML/CTF policy, it is considered that certain activities, customers and/ or products bear unacceptable risk. Such activities, customers, products & services are prohibited.

Transactional related prohibitions

- Transactions that appear to relate to any form of illegal activity, including without limitation, money laundering, terrorism financing, human trafficking, political corruption, illegal wildlife trafficking, illegal copyrighting and software, counterfeit goods or imitations, stolen goods, hacking and cracking material, offensive goods, fraudulent activities, etc.;
- Transactions that appear to violate or circumvent sanctions legislation applicable to Angra (Angra closely monitors UN, OFAC and any local sanctions regimes);
- Transactions involving parties that are outside of Angra's risk appetite due to geographic risk exposure. Geographic risk exposure is assessed in terms of AML, sanctions, tax and corruption risk, as well as compared with FATF and UN high-risk and proscribed jurisdictions' lists on a quarterly basis and as new restrictions emerge.

Customer related prohibitions

At a minimum, Angra may not establish business relationships with prospect customers or maintain business relationships with existing customers when they are:

- Shell banks or financial institutions that facilitate transactions on behalf of shell banks;

- Customers for whom it is unable to determine the UBO(s) or other related parties required to complete CDD;
- Customers and related parties sanctioned under the UN, OFAC and local sanctions regimes where Angra operates;
- Parties for which Angra has money laundering, terrorism financing or other financial economic crime concerns;
- Customers who are non-direct account holders;
- Customers outside of Angra’s AML Risk Appetite due to industry risk, such as customers operating within the following industries:
 - Sex and Escort Industry
 - Armaments Manufacture and Trade
 - Atomic Power/ Nuclear Energy
 - Oil and Gas Extracting and Drilling
 - Marijuana and other illegal drugs
 - Unlicensed businesses and/or business not supervised by local equivalent regime, or businesses failing to meet Angra’s overall AML assessment requirements.

Please note that, Angra does not open secret or anonymous accounts, accounts under fictitious names, and in principle, offers services to customers residing in the country of every branch operation.

Product Related Prohibitions

As a minimum, services such as anonymous accounts, numbered accounts, accounts bearing fictitious names, payable-through-accounts, may not be offered by Angra.

Communication with customers and Requests for Information

From time to time, Angra team will request information from clients regarding their business to fulfill Angra’s “know your customer” responsibilities. Angra team may also contact clients to: (1) request information about their transactions; (2) share information on their business/financial profile; and/ or (3) request that they justify the activity in their accounts, or even refrain from using their accounts with the Company for executing transactions with certain characteristics. It is essential that clients provide elaborate responses to the requests and comply with Angra’s directions in a timely manner.

We kindly request that you ensure compliance with the above, as failure to comply with our internal policies and risk appetite could lead to rejection of payments and/or closure of your accounts. Your acknowledgement of the policy statement is greatly appreciated.