

ANTI-FRAUD POLICY



Policy Statement

Stellar Invest creates opportunities for the people and builds trust between them worldwide. Stellar Invest is committed to conducting business in accordance with the highest ethical, professional and legal standards. The public, Stellar Invest partners and Users' have the right to expect that professional, competent and trustworthy people are employed by Stellar Invest. Stellar Invest will comply with applicable legislation. In line with applicable legislation Stellar Invest has a 'zero tolerance' policy towards fraud, corruption, collusion, money laundering, financing of terrorism and other criminal conduct (jointly "Prohibited Conduct") and will thoroughly investigate and seek to take disciplinary and/or legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper actions in all Stellar Invest activity and related transactions.

Stellar Invest will provide adequate and appropriate resources to implement the Anti-Fraud Policy and will ensure it is communicated and understood.

Legislation Compliance

The Anti-Fraud Policy has been drafted to comply with the current applicable local and international legislation, including, but not limited to applicable UK/EU legislation. Adherence to the Anti-Fraud Policy Stellar Invest will ensure compliance with all relevant legislation and internal policies.

Definitions

In pursuance of the Anti-Fraud Policy, Prohibited Conduct includes fraud, corruption, collusion, money laundering, financing of terrorism and other criminal conduct defined as follows:

- a) Fraud: any act or omission, including a misrepresentation that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- b) Corruption: offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the action of another party.
- c) Collusion: arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.
- d) Money laundering:
 - the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;
 - the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of property, knowing that such property is derived from criminal activity or from an act of participation in such activity;
 - the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such activity;
 - participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counseling the commission of any of the actions mentioned in the foregoing points;
 - terrorist financing: provision or collection of funds, by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out any of the offences within the meaning of Articles 1 to 4 of Council Framework Decision 2002/475/JHA of 13 June 2002 on combating terrorism;
 - criminal conduct: conduct, which constitutes an offence in any part of the world or would constitute an offence in any part of the world if it occurred there.

Key Responsibilities

Stellar Invest performs a “Know-Your-Customer Policy” (KYC) due diligence on all new Users and a due diligence on all transactions in order to detect possible compliance or integrity concern. Such due diligence is performed in accordance with the requirements of the money laundering and terrorist financing activities regulations, pursuant to the terms of KYC. In view of the Anti-Fraud Policy Stellar Invest is responsible for:

- ensuring efficient and effective systems, procedures and internal controls are in place to enable the prevention and detection of Prohibited Conduct;
- ensuring the Anti-Fraud Commissioner identifies Prohibited Conduct risks in their areas of business and that all systems, procedures and internal controls are properly implemented and enforced;
- ensuring all members of the operational anti-fraud department have a duty to report any internal and external suspicions or incidents of Prohibited Conduct;
- reviewing continuously its systems, procedures and internal controls through risk management processes and audit arrangements;
- reporting any suspicions regarding Prohibited Conduct to the relevant state authorities.

Stellar Invest will review the Anti-Fraud Policy to reflect new legal and regulatory developments and ensure good practice.