



GWG (CYPRUS) LIMITED

FUNDING POLICY

FUNDING POLICY	
APPROVER(S):	Board of Directors
OWNER:	GWG (Cyprus) Ltd
CONTACT PERSON:	Compliance Officer
REVIEW DATE:	May 2022
VERSION:	3.1

Email: info@gwtrade.eu - Website: www.gwtrade.eu

GWG (Cyprus) Ltd (Reg. No. HE342580) - Regulated by the Cyprus Securities and Exchange Commission, License No. 291/16
Version 3.1. May 2022



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GWG (CYPRUS) LIMITED

GWTRADE.EU is a brand owned and operated by GWG (Cyprus) Ltd which is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number C342580. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the "CySEC") under the license number 291/16.

GWG (Cyprus) Ltd segregates client accounts to ensure that these funds are fully always separated from GWG (Cyprus) Ltd own funds. Client accounts are coded to ensure that they are used for clients' funding purposes. All client funds deposited with GWG (Cyprus) Limited are completely separated following our strict policies and procedures, with compliance monitored and reviewed by our external and internal auditors.

GWG (Cyprus) Ltd does not charge any fees for deposits or withdrawals. In the case of currency conversion relevant rates apply. We are unable to provide information on any charges levied by banks or payment providers we use who may charge their own fees.

1. Deposits general procedure

A client can fund his/her account by depositing funds within the available options at www.gwtrade.eu. Funding methods can be chosen by clicking on 'My Account' and then 'Deposit'. Please note that depending on the used funding method, sometimes it can take more than 24hrs to be processed and this is especially valid for Bank Transfers. Not all funding options are available in all countries, and the methods available will depend on your specific country of residence, as this will be shown in your client's area menu.

The minimum initial deposit is \$100 / €100, and any subsequent new deposit minimum amount is again \$100 / €100. The company reserves the right to decrease / increase any maximum amount at its own discretion and the same applies to payment providers we use or might use in the future, which impose their own limits. The company can adjust its maximum deposit amount policy without the need to provide any explanation as to why. The Company does not charge any deposit fees. Various deposit methods / options are accepted depending on your specific country of residence but there is no guarantee that the same payment / deposits methods will also be available in the future. The company accepts Bank Transfers, via any credit / debit card if this option is available to your country of residence (i.e., Visa, MasterCard), as well as any other type of funding the company decides to use anytime in the future. The availability of any of the above funding methods can change without notice, and there is no guarantee that any of the above funding methods will be available in your country of residence now or in the future.

2. Deposit indicators

Prior to adding deposits in the client's account, the following indicators will be considered, consisting in general deposits procedure indications:

- ✓ Account history: Since we cannot allow 3rd party payments, we need to check that the account is being funded exclusively by the client himself.



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- ✓ When an account has been marked as suspicious by the Company.
- ✓ When adding high amount deposit(s) a check needs to be performed to ensure a low level of risk for the client. If a client deposits at once and/or cumulatively over 15,000 EUR or equivalent, an on-going Monitoring needs to be done and the Compliance Officer needs to be informed for monitoring purposes. Additionally, the client will need to fill in the "Declaration of Deposit" Form which can be found in APPENDIX 1 below.
- ✓ In the case of suspended and closed accounts no funding activity will be allowed.

3. Bank transfers

Bank Transfer deposits are being deposited to segregated Clients Accounts within the various Banks the company might be using anytime. All the Client's deposited funds are safe and secure in EU regulated and duly authorised banking institutions as per our regulator's requirements. The company reserves the right to use any other additional banks for secure segregated clients' accounts based on our business requirements. Depending on your country of residence, a Bank Transfer can be the only available method for funding your account with gwtrade.eu.

For the bank transfers to be processed in the client's account, various security verifications will be conducted. Therefore, to approve a bank transfer deposit, the name of the client needs to coincide with the name on the swift or payment advice, to ensure that the client is indeed the holder of the feeder bank account.

To prevent Bank Transfer Fraud, please note that proof documenting ownership of the feeder account can be requested anytime by the company, according but not limited to the following cases:

- ✓ Use of multiple different feeder accounts to fund your account with GWG.
- ✓ Incoming payment details holder's name issue.
- ✓ Bank Transfer originating from a country where there are sanctions.
- ✓ Bank Transfer originating from a country with high levels of fraud.
- ✓ 3rd Party deposit (we do not allow funding from 3rd parties).
- ✓ Deposit from corporate bank accounts.
- ✓ Suspicious deposit activity.

4. Debit / credit card transfers

All debit/credit card transactions are being processed by regulated and duly authorised credit card processors (the company reserves the right to use any other additional processor/s based on our business requirements). You can only use the credit cards shown to be available in your country of residence (if available) for funding your account. Debit / Credit Cards are not available in all countries. We enforce a zero tolerance on any fraudulent activity using any Credit card.



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Debit / Credit Card processors have different funding options depending on your country of residence and different fraud prevention measures.

For the transaction to be processed in the client's account, various security verifications will be conducted by our funding processing partners. Therefore, to approve a debit / credit card deposit, the name of the client needs to coincide with the name on the credit card, to ensure that the client is indeed the holder of the credit card.

To prevent Credit Card Transactions Fraud, please note that card-coloured copies can be requested anytime by the company, according but not limited to the following cases:

- ✓ Many deposits in different currencies.
- ✓ High deposits within one day/week.
- ✓ Use of multiple different Debit / Credit Cards.
- ✓ Mismatch between the currency of the deposit and the currency of the country of residence.
- ✓ Card holder's name issue.
- ✓ 3rd Party deposit (we do not allow such funding).
- ✓ Deposit from company card.
- ✓ Suspicious deposit activity.

As stated above, the Company reserves its right before accepting any deposit to request additional documentation for regulatory and compliance reasons. Failure by the client to comply and provide any requested documentation will allow the Company the right to refuse any deposit or suspend any account.

5. Bank / credit card charges

The company does not charge any fees for funding an account. Furthermore, it is the Company's policy not to cover the bank charges or charges imposed by any third party used by the client to fund their account (if any) for any amount.



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APPENDIX



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From: (Client's name & Address)

Date: DD/MM/YY

To: GWG (Cyprus) Ltd
HE342580
18, Kyriakou Matsi Av, 3rd Floor,
Office 302, 1082 Nicosia, Cyprus

Re: Funds Deposit Declaration

I, the undersigned (clients full name), with ID/Passport number (document number), hereby declare that I have agreed to engage GWG (Cyprus) Ltd (hereinafter called the "Company") under their Terms & Conditions and receive the relevant investment services.

I agree that all the transactions listed on the table below ("Table 1") were made and authorized by me, for trading purposes with GWG (Cyprus) Ltd. The purpose was to fund my personal trading account with the Company.

I understand that all the trading activities on my account are my responsibility and I comprehend that there is a risk of loss of my capital associated with the trading.

I understand that this document is essential to comply with the Company's Anti Money Laundering Policy, worldwide regulatory bodies, and the major credit card issuing bodies involved in the transaction(s).

TABLE 1

#	Clients Full Name	Transaction Date	Amount	Currency (€)	Currency (\$)	Transaction ID
1						
2						
3						
4						
5						

Clients Name: _____

Signature: _____