

ANTI - FRAUD POLICY

RigelPlatform creates opportunities for the people and builds trust between them worldwide. RigelPlatform is committed to conducting business in accordance with the highest ethical, professional and legal standards. The public, RigelPlatform's partners and Users' have the right to expect that professional, competent and trustworthy people are employed by RigelPlatform.

RigelPlatform will comply with applicable legislation. In line with applicable legislation RigelPlatform has a 'zero tolerance' policy towards fraud, corruption, collusion, money laundering, financing of terrorism and other criminal conduct and will thoroughly investigate and seek to take disciplinary and legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper actions in all RigelPlatform activity and related transactions.

RigelPlatform 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. Adherence to the Anti-Fraud Policy RigelPlatform 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:

- 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.

- Corruption: offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the action of another party.
- Collusion: arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.
- 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

RigelPlatform 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 RigelPlatform 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.

FRAUD DETECTION AND INVESTIGATION

RigelPlatform Operational Anti-Fraud Department, in particular, the Anti-Fraud Commissioner, is the first line of detection, investigation

and protection in preventing Prohibited Conduct through the Users and transactions appraisal process. The Anti-Fraud Commissioner will be responsible for the proper fulfillment of the Anti-Fraud Policy.

AUTHORITY

The Anti-Fraud Commissioner, through the Operational Anti-Fraud Department, working in close collaboration with the Nominated Officer shall be responsible for:

- receiving reports of alleged or suspected Prohibited Conduct involving RigelPlatform, its Users and/or related transactions;
- investigating such matters and cooperating directly with the Nominated Officer in order to facilitate the investigations;
- reporting its findings to the RigelPlatform management and relevant authorities, as well as any other third party on a need-to-know basis.

INDEPENDENCE

The Operational Anti-Fraud Department shall enjoy complete independence in the exercise of its responsibilities. The Anti-Fraud Commissioner shall have full authority to open, pursue, close and report on any investigation on Prohibited Conduct within its remit without prior notice to, the consent of, or interference from any other person or entity.

PROFESSIONAL STANDARDS

All Prohibited Conduct investigations conducted by the Operational Anti-Fraud Department shall be fair and impartial, with due regard to the rights of the Users and persons or entities involved. The presumption of innocence applies to those alleged to have engaged in misconduct. Those involved in the Prohibited Conduct investigation (be those under investigation or those conducting the investigation) should be aware of their rights and obligations and ensure they are fully respected.

COOPERATION

All Users are required to cooperate with the Operational Anti-Fraud Department and the Anti-Fraud Commissioner promptly, fully, efficiently and in the manner specified by the Operational Anti-Fraud Department, including by answering relevant questions and complying with requests for information and records.

CONFIDENTIALITY

In accordance with RigelPlatform internal rules on access to information, all information and documents collected and generated during a Prohibited Conduct investigation, not already in the public domain, shall be kept strictly confidential. The confidentiality of the information collected will be respected both in the interests of those concerned and the integrity of the investigation. In particular, during the Prohibited Conduct investigation the confidentiality will be respected in so far as it would not be contrary to the interests of the investigation.

The Operational Anti-Fraud Department shall disclose such information and documents only to those persons or entities authorized to receive them or otherwise on a need-to-know basis.