

# LEE & BRONSKI AML CTF

Version 2111A

Anti-Money Laundering Policy......1

Anti-Money Laundering Policy

Lee & Bronski sp. z o. o. actively complies with all antimoney laundering and anti-terrorism laws and regulations to the fullest extent that it can, under all applicable domestic and foreign laws.

Lee & Bronski is committed to implementing single global standards shaped by the most effective antimoney laundering standards available in any location where Lee & Bronski sp. z o. o. operates. Lee & Bronski sp. z o. o. has established an own Anti-Money Laundering Programme ("AML Programme") for this purpose compliant with all jurisdictions and relevant legislative environment where Lee & Bronski sp. z o. o. conduct business endeavors. The objective of the AML Programme is to ensure that money laundering risks identified by Lee & Bronski sp. z o. o. are appropriately mitigated while our stringent due diligence policies and procedures are implemented to detect, prevent and report Money Laundering and any other suspicious activities. This is achieved by establishing Board-approved policies, principles and standards and implementing appropriate controls, to protect Lee & Bronski sp. z o. o., its employees, shareholders and customers from any attempts of money laundering. The AML Programme provides guidance to all Lee & Bronski sp. z o. o. employees, requiring them to conduct business in accordance with applicable AML laws, rules, and regulations.

#### Account Funding and Settlement

#### Account Ownership

Lee & Bronski will not accept any third party deposits or settlement requests. A third party is considered to be anyone who is not an owner of the account or anyone who has not entered into an agreement with Lee & Bronski. For the purposes of a funding or withdrawal transaction, the name(s) on the Lee & Bronski account signed agreements and documents provided must be an exact match with the name(s) on the account of the other financial institution.

#### **User Verification**

Lee & Bronski's Customer Due Diligence program requires that we at times verify the source of our client's funds before purchasing the property or entering the fractional investment scheme. This is fundamental in complying with anti-money laundering laws and managing fraud risks.

#### **Supporting Documents**

Lee & Bronski will process your documents upon receiving a complete document package consisting of 3 elements:

# (A). Identification Proof

Copy of Passport or National ID with both sides scanned. Visible and clear photo is required on the copy. Please note that Lee & Bronski may use a 3<sup>rd</sup> party platform for screening and checking validity of the documents provided.

# (B). Proof from a regulated financial institution

Bank statements from the bank used for remitting the payment for the real estate or bank cards proofs (only if credit/debit cards are used for remitting funds to Lee & Bronski).

# (C). Address Proof

Requirements may vary from country to country; in general we accept utility bills indicating the name and address, government issued documents such as driver's licenses, provided they include the address and bank statements with addresses on them.

# (D). Optional

Completed and signed Assessment of Appropriateness or other Questionnaires and Forms provided by Lee & Bronski at our sole discretion.

# **Documentation Upload**

The most efficient option is to upload your documents via My Account - our secure online account management portal, or alternatively send it directly to contact@leebronski.com.

#### FAQ

#### How is Money Laundering Defined?

When criminals attempt to relocate their illicit funds by transferring them to a lawful financial system without arousing any legal attention, this constitutes Money Laundering. Once a criminal or terrorist person(s) transfers their funds into legitimate financial systems, they can then transfer them between banks or financial products to use in illegal activities, purchase goods and services, or even fund terrorism. Lee & Bronski will report any attempt by an individual or business to conceal the origin and ownership of the proceeds of illegal activities, including fraud, theft, illegal gambling, drug trafficking, and other activities.

# Do I Need to Prove My Identity Before entering the agreement with Lee & Bronski?

To prevent Money Laundering, Lee & Bronski requests that all of our customers provide supporting documentation for proof of identity and the origin of their funds before purchasing the entire or fractional property with us. We place great emphasis on verifying the identity of our customers and determining that their funds are derived from a legal origin before upgrading the case to the Notary who will require your identification documents anyway, before registering you as the property owner in the Deeds Registers. As part of this policy, you will be required to provide legal documentation to verify your name, personal details and location.