

Moshe Strugano & Co
Attorneys at Law
משה סטרוגנו ושות' ע"ד

Tel: +972 (0)3 9411894 **Fax:** +972 (0)57 7977899 **E.mail:** moshe@strugano.com
Azrieli Center, Square Tower (26 floor), Tel Aviv, Israel 6701101 **www.strugano.com**

To: WSB INVESTMENT LTD

Legal Opinion

I, the undersigned Moshe Strugano, Adv., in my capacity of legal representative of WSB Investment Ltd, a company incorporated in Anguilla, under the International Business Companies Act, 2000, on the 27th day of March, 2014 with Registration Number 2309397, and was continued and registered in St. Vincent & the Grenadines under the International Business Companies (Amendment and Consolidation) Act Chapter 149 of the Revised Laws of Saint Vincent and the Grenadines, 2009, on the 2nd day of September, 2015. The International Business Company Number is 1558 CTD 2015, whose registered office is situated at the Financial Services Centre, Stoney Ground, Kingstown, St. Vincent & the Grenadines and WSB INVESTMENT LTD, a company incorporated in UK, with incorporation number 9063721, whose registered office is situated at 1A Arcade House, Temple Fortune, London, NW11 7TL, UK hereby confirm that WSB Investment Ltd operates in accordance to the laws and regulations in Saint Vincent and the Grenadines where there are no requirements of operating licence for entities offering binary options services. The company WSB INVESTMENT LTD operates in accordance with the laws and regulations in its country of incorporation United Kingdom and in full regulatory compliance, in accordance with its services provided.

I also hereby confirm that both companies operate in accordance with the AML and due diligence policies of the country of incorporation and respective target markets. WSB INVESTMENT LTD was created and operates solely for the purpose of accepting processing services, yet all operation are carried out by WSB Investment LTD From WSB Investment LTD's offices.

WSB Investment Ltd performs specific marketing campaigns in the following countries: Australia, New Zealand, South Africa, Canada (other than Quebec, British Columbia), SAU, UAE, Kuwait, Oman, Qatar, Singapore, Russia, Ukraine, Belarus, Kazakhstan, Azerbaijan, Uzbekistan, and Turkey. WSB Investment Ltd. may encounter transactions from the following countries without any specific marketing campaign or targeted consumer acquisition: India, Kenya, Egypt, Indonesia, Malaysia, Nigeria, Algeria, Moldova, Morocco, Pakistan, Trinidad and Tobago and Lebanon.

As an international binary options broker, WSB Investment Ltd follows strictly the AML and due diligence procedures in each of the targeted countries and confirms that no transactions will be accepted from countries outside the above mentioned list. Customer Identification Procedure (CIP) is carried out on the following stages:

- While establishing the relationship
- While carrying out a financial transaction
- When the branch/office has a doubt about the authenticity/veracity or the adequacy of the previously obtained customer identification data.

Customer identification means identifying the customer and verifying his/her identity by using reliable, independent source documents, data or information. WSB Investment Ltd obtains sufficient information including, but not limited to, ID, valid utility bill, transaction verification proofs etc. necessary to establish, to their satisfaction, the identity of each new customer, whether regular or occasional, and the purpose of the intended nature of banking relationship. Being satisfied means that WSB Investment Ltd must be able to satisfy the competent authorities that due diligence was observed based on the risk profile of the customer in compliance with the extant guidelines in place in accordance with the relevant jurisdiction/s where such requirements may apply.

For the purpose of KYC policy, a customer may be defined as:

- A person or entity that maintains an account and/or has a business relationship with WSB Investment Ltd
- On whose behalf the account is maintained (i.e. the beneficial owner)
- Beneficiaries of transactions conducted by professional intermediaries, such as stock brokers, chartered accountants, solicitors etc. as permitted under the Law.
- Any person or entity connected with a financial transaction, which can pose significant reputation or any other risks to WSB Investment Ltd, say, a wire transfer or issue of high value demand draft as a single transaction.

KYC policy includes the following eight key elements - customer identification procedures, monitoring of transactions, risk management, training program, internal control system, record keeping, and evaluations of KYC guidelines by internal audit and inspection system, duties / responsibilities and accountability.

An effective KYC program is put in place by WSB Investment Ltd, establishing appropriate procedure and ensuring their affective implementation. It covers proper management oversight, systems and controls, segregation of duties, training and other related matters. Responsibility is explicitly allocated within the company for ensuring that the company's policies and procedures are implemented effectively.

The nature and extent of due diligence depends on the risk perceived by the WSB Investment Ltd's customer profile. WSB Investment Ltd's internal audit and compliance have an important role in evaluating and ensuring adherence to the KYC policies and procedures. The compliance function provides an independent evaluation of the WSB Investment Ltd's own policies and procedures, including legal and regulatory requirements. It ensures that the audit machinery is staffed adequately with individuals who are well versed in such policies and procedures. Internal inspectors specifically check and verify the application of KYC procedures at the branched/offices and comment on the lapses observed in this regard.

Please note: I, the undersigned, am an independent attorney and hold no position and/or am employed by the merchant.

Date: 14/01/2016

Surname and first name: Moshe Strugano

Title or position: Attorney

Signature: _____

