

Na osnovu članova 6 i 7b Zakona o sprječavanju pranja novca i finansiranja terorizma ("Sl. list CG" br. 33/14, 44/18, 73/19 i 70/21), Smjernica za pristup zasnovan na riziku i izradu analize rizika od pranja i finansiranja terorizma za učesnike na tržištu kapitala ("Sl. list CG" br 61/19) i člana 42 Statuta akcionarskog društva RSI GLOBAL Investiciono društvo A.D. Podgorica (u daljem tekstu Društvo), Odbor direktora RSI GLOBAL Investicionog društva a.d. Podgorica, na sjednici održanoj 07.11.2022. godine donosi

## **Politiku sprječavanja pranja novca i finansiranja terorizma**

### **Član 1 CILJ I SVRHA**

RSI Global Investiciono društvo AD Podgorica preduzima sve neophodne radnje kako se njegovo poslovanje ne bi moglo ni na koji način koristiti u svrhu pranja novca, odnosno kako niko ne bi mogao da koristi njegove aktivnosti za prenos sredstava ili oblika imovine stečene nezakonitim radnjama.

Takođe, Društvo preduzima sve neophodne radnje kako se njegovo poslovanje ne bi moglo ni na koji način koristiti u svrhu finansiranja terorizma, odnosno terorističkih akata ili terorističkih organizacija.

Cilj ove politike je da se definiše okvir u kome bi sve aktivnosti Društva bile u skladu sa Zakonom o sprječavanju pranja novca i finansiranja terorizma, odnosno propisom Komisije za tržište kapitala koji se odnosi na sprečavanje pranja novca i finansiranja terorizma, a koji u skladu sa Direktivom EU i standardima FATF (Financial Action Task Force).

Based on Articles 6 and 7b of the Law on Prevention of Money Laundering and Financing of Terrorism ("Official Gazette of the Republic of Montenegro No. 33/14, 44/18, 73/19 and 70/21), Guidelines for a Risk-Based Approach and Preparation of Risk Analysis from money laundering and terrorist financing for capital market participants ("Official Gazette of Montenegro 61/19") and Article 42 of the Statute of the RSI GLOBAL Investiciono društvo A.D. Podgorica (hereinafter the Company), Board of Directors of RSI GLOBAL Investiciono Društvo A.D. Podgorica, at the session held on November 07, 2022. year brings

## **Policy of prevention of money laundering and financing of terrorism**

### **Article 1 GOAL AND PURPOSE**

RSI Global Investiciono društvo AD Podgorica undertakes all necessary actions so that its operations could not be used in any way for the purpose of money laundering, i.e. so that no one could use its activities to transfer funds or forms of property acquired through illegal activities.

Also, the Company undertakes all necessary actions so that its operations could not be used in any way for the purpose of financing terrorism, that is, terrorist acts or terrorist organizations.

The goal of this policy is to define a framework in which all the Company's activities would be in accordance with the Law on the Prevention of Money Laundering and Terrorist Financing, i.e. the regulation of the Capital Market Commission related to the prevention of money laundering and terrorist financing, which is in accordance with the Directive EU and FATF (Financial Action Task Force) standards.

**ČLAN 2**  
**OSNOVNI PRINCIPI POLITIKE BORBE OD**  
**PRANJA NOVCA I FINANSIRANJA**  
**TERORIZMA**

Društvo pokazuje svoju posvećenost sprječavanju pranja novca i finansiranja terorizma kroz procedure i pravilnike u kojima se utvrđuju načini identifikacije pojave pranja novca i finansiranja terorizma, uloga Društva i zaposlenih u sprječavanju takvih pojava, mjere koje se preduzimaju, kao i odgovornosti lica u Društvu koja su zadužena za sprječavanje ovih aktivnosti.

**ČLAN 3**  
**MJERE I AKTIVNOSTI ZA SPRJEČAVANJE PRANJA**  
**NOVCA I FINANSIRANJA TERORIZMA**

I) U svojoj organizacionoj strukturi Društvo ima zaposleno lice čiji je primarni zadatak da obezbijedi da poslovanje Društva bude u punoj saglasnosti sa pravnim okvirom Crne Gore koji se odnosi na sprječavanje pranja novca i finansiranja terorizma, kao i da obavlja sve poslove u okviru Društva kako se njegovo poslovanje u tom smislu ne bi zloupotrebilo.

II) RSI Global posebnu pažnju posvećuje riziku od pranja novca i finansiranja terorizma u svojim aktivnostima vezanim za procenu i upravljanje rizikom.

U okviru procene ovog rizika neophodno je sljedeće:

- Procijeniti vjerovatnoće i mogućnosti u kojima bi Društvo moglo biti zloupotrebjeno u svrhu pranja novca i finansiranja terorizma;
- Odrediti kriterijume po kojima bi se klijenti mogli proceniti u odnosu na nivo rizika koji Društvo preuzima u poslovanju sa njima;
- Odrediti mjere za upravljanje ovim rizikom.

III) RSI Global sprovodi finansijsku politiku i uspostavlja procedure finansijske kontrole koje se koriste za:

**ARTICLE 2**  
**BASIC PRINCIPLES OF THE FIGHT AGAINST**  
**MONEY LAUNDERING AND THE FINANCING**  
**OF TERRORISM**

The Company demonstrates its commitment to the prevention of money laundering and terrorist financing through procedures and regulations that determine the ways of identifying the occurrence of money laundering and terrorist financing, the role of the Company and its employees in preventing such occurrences, the measures taken, as well as the responsibilities of the persons in the Company who are in charge to prevent these activities.

**ARTICLE 3**  
**MEASURES AND ACTIVITIES TO PREVENT**  
**MONEY LAUNDERING AND THE FINANCING OF**  
**TERRORISM**

I) In its organizational structure, the Company has an employee whose primary task is to ensure that the Company's operations are in full compliance with the legal framework of Montenegro related to the prevention of money laundering and terrorist financing, as well as to perform all tasks within the Company as required his business in that sense would not abuse.

II) RSI Global pays particular attention to the risk of money laundering and terrorist financing in its activities related to risk assessment and management.

As part of the assessment of this risk, the following is necessary:

- Assess the probabilities and possibilities in which the Company could be misused for the purpose of money laundering and terrorist financing;
- Determine the criteria by which clients could be evaluated in relation to the level of risk that the Company assumes in doing business with them;
- Determine measures to manage this risk.

III) RSI Global implements financial policies and establishes financial control procedures used to:

-Između ostalog, koristi se procjena svih aplikacija za finansijski proizvod ili uslugu i kroz analizu profila klijenata, odnosno KYC (Know Your Customer) pristup, kao i CDD (Customer Due Diligence) pristup. Primjenom ova dva principa, klijenti sa potencijalnim rizikom u smislu pranja novca i finansiranja terorizma se identifikuju u ranoj fazi.

- Klasifikacija klijenata u pogledu rizika od pranja novca i finansiranja terorizma u skladu sa pravnim okvirom Crne Gore;

- Obraduje informacije koje potiču iz zakonskog okvira i odnose se na pranje novca i finansiranje terorizma, odnosno provjerava tzv. „crne liste“ i ne saraduje sa fizičkim i pravnim licima koja se na njima nalaze;

- Definisane obaveze izvještavanja odgovornog lica u Društvu u slučajevima kada je utvrđen nastanak rizika od nezakonitog pranja novca i finansiranja terorizma. Odgovorno lice u Društvu preuzima sve poslove izvještavanja prema nadležnim javnim organima, u skladu sa zakonom;

- Izbegavanje poslovanja sa of-šor pravnim licima, neidentifikovanim pravnim licima ili pravnim licima osnovanim za posebne transakcije.

IV) Svi zaposleni u Društvu moraju biti upoznati sa rizicima u vezi sa pranjem novca i finansiranjem terorizma i moraju biti obučeni za identifikaciju tih rizika, kao i za aktivnosti borbe protiv tih pojava.

#### **ČLAN 4**

Na osnovu člana 7a Zakona, ali i uvažavajući strukturu Društva, uobičajene usluge koje pruža klijentima kao i uobičajene odnose sa klijentima, a u skladu sa Smjernicama za pristup zasnovan na riziku i izradu analize rizika od pranja i finansiranja terorizma za učesnike na tržištu kapitala, klijenti mogu biti klasifikovani u dvije grupe:

-Among other things, the assessment of all applications for a financial product or service is used through the analysis of client profiles, that is, the KYC (Know Your Customer) approach, as well as the CDD (Customer Due Diligence) approach. By applying these two principles, clients with a potential risk in terms of money laundering and terrorist financing are identified at an early stage.

- Classification of clients with regard to the risk of money laundering and terrorist financing in accordance with the legal framework of Montenegro;

- Processes information originating from the legal framework and related to money laundering and financing of terrorism, i.e. checks the so-called "black lists" and does not cooperate with natural and legal persons who are on them;

- Defining the reporting obligations of the responsible person in the Company in cases where the risk of illegal money laundering and financing of terrorism has been determined. The responsible person in the Company undertakes all reporting tasks to the competent public authorities, in accordance with the law;

- Avoiding doing business with offshore legal entities, unidentified legal entities or legal entities established for special transactions.

IV) All employees of the Company must be familiar with the risks related to money laundering and terrorist financing and must be trained to identify these risks, as well as to fight against these phenomena.

#### **ARTICLE 4**

On the basis of Article 7a of the Law, but also respecting the structure of the Company, the usual services it provides to clients as well as usual relations with clients, and in accordance with the Guidelines for a risk-based approach and the preparation of a risk analysis of money laundering and terrorist financing for capital market participants, clients may be classified into two groups:

- klijenti visokog rizika vezanog za potencijalno izvršenje djela pranja novca i finansiranje terorizma;
- klijenti niskog rizika vezanog za potencijalno izvršenje djela pranja novca i finansiranje terorizma.

Skala rizičnosti i podjela na visoko-rizični i nisko-rizični odnos se usvajaju na osnovu veličine Društva (malo privredno društvo), nivoa poslovnih aktivnosti sa klijentima (mali obim poslovnih aktivnosti i usluga klijentima), vrste usluga koji se pružaju klijentima (posrednički poslovi u trgovini jednostavnim finansijskim instrumentima na domaćem tržištu kapitala), transparentnosti u vršenju usluga (zbog malog prometa na tržištu skoro sve transakcije su lako uočljive).

#### ČLAN 5

Prilikom procjene rizičnosti svakog klijenta, vrši se procjena indikatora visokog i niskog rizika koji se odnose na:

- vrstu usluge koja se pruža klijentu i koju klijent koristi, pri čemu se uobičajene usluge kao što su posrednički poslovi jednostavnim instrumentima na tržištu kapitala Crne Gore posmatraju kao nisko rizične, dok bi eventualno pružanje posredničkih usluga složenijim instrumentima moglo imati viši nivo rizika;
- porijeklo klijenta, pri čemu se klijentima koji potiču iz područja koje se može posmatrati kao rizično odnosno kada klijenti vode porijeklo iz off-shore zemalja, zemalja koje su predmet sankcija i drugih mjera UN-a i Savjeta Evrope, iz država koje su od strane relevantnih međunarodnih organizacija prepoznate kao države sa visokim stepenom kriminala, korupcije i kršenja ljudskih prava, iz država koje daju podršku terorističkim aktivnostima i organizacijama, iz država za koje je poznato da predstavljaju bazu određenih terorističkih i kriminalnih organizacija, iz zemalja koje su od strane FATF-a označene kao visokorizične i nekooperativne i područja koja nijesu subjekt međunarodnog prava, pripisuju

- high-risk clients related to the potential commission of money laundering and terrorist financing;
- low-risk clients related to the potential commission of money laundering and terrorist financing.

The scale of riskiness and the division into high-risk and low-risk relationships are adopted based on the size of the Company (small business), the level of business activities with clients (small volume of business activities and services to clients), the type of services provided to clients (brokerage in trade in simple financial instruments on the domestic capital market), transparency in the provision of services (due to the low turnover on the market, almost all transactions are easily observable).

#### ARTICLE 5

When assessing the riskiness of each client, an assessment is made of high and low risk indicators related to:

- the type of service that is provided to the client and used by the client, where usual services such as brokerage with simple instruments on the capital market of Montenegro are seen as low-risk, while the eventual provision of brokerage services with more complex instruments could have a higher level of risk;
- origin of the client, whereby clients originating from areas that can be seen as risky, i.e. when clients originate from off-shore countries, countries that are subject to sanctions and other measures of the UN and the Council of Europe, from countries that are relevant international organizations recognized as countries with a high level of crime, corruption and human rights violations, from countries that support terrorist activities and organizations, from countries that are known to represent the base of certain terrorist and criminal organizations, from countries that are recognized by the FATF and marked as high-risk and non-cooperative and areas that are not subject to international law, attributes a high level of risk, and persons who do

visok nivo rizika, a licima koja ne dolaze iz neke od grupa pomenutih područja, nizak nivo rizika.

- drugim kriterijumima pri čemu se viši nivo rizika dodjeljuje licima za koje je Društvu poznato da su se u prethodnom periodu bavila nelegalnim aktivnostima, politički eksponiranim licima, licima koja vrše neuobičajene transakcije ili transakcije neusklađene sa njihovim uobičajenim obrascem aktivnosti ili izvorima sredstava, licima koja odbijaju davanje podataka, licima koje se nalaze na crnim listama, licima čija je djelatnost povezana sa oružjem ili gotovinskim poslovanjem, licima koja imaju složenu vlasničku strukturu.

Dodijeljeni nivo rizika se boduje na način da se za svaki visoko-rizični indikator kod klijenta dodjeljuju 2 boda, a za svaki nisko-rizični 1 bod. Dodatno, svako visoko-rizično bodovanje (2 boda) se ponderiše faktorom-ponderom 2, a svako nisko-rizično bodovanje faktorom-ponderom 1. Ukoliko zbir ponderisanih ocjena podijeljen sa brojem faktora koji su uzeti u obzir i ocjenjivani, daje vrijednost veću od 2, klijent spada u grupu klijenata visokog rizika. Ukoliko, zbir ponderisanih ocjena podijeljen sa brojem faktora koji su uzeti u obzir i ocjenjivani, daje vrijednost manju od 2, klijent spada u grupu klijenata niskog rizika.

Nezavisno od navedenog načina određivanja nivoa rizika za svakog klijenta, u klijente visokog rizika spadaju sva lica koja vrše sumnjive i transakcije bez ekonomskog osnova.

## ČLAN 6

U slučaju da se klijent i odnos sa njim procijeni kao rizičan, Društvo će primijeniti mjere za ublažavanje rizika, na način što će:

- vršiti identifikaciju klijenta na način propisan Zakonom, uključujući identifikaciju ovlaštenog lica, i osnivača i stvarnog vlasnika u slučaju da je klijent pravno lice, uz dostavljanje dokumentacije koja je propisana Zakonom i pravilima Komisije za tržište kapitala i Društva;

not come from one of the groups of the mentioned areas, a low level of risk.

- other criteria, whereby a higher level of risk is assigned to persons known to the Company to have engaged in illegal activities in the previous period, politically exposed persons, persons who carry out unusual transactions or transactions inconsistent with their usual pattern of activities or sources of funds, persons who refuse providing data to persons who are on black lists, persons whose activities are related to weapons or cash transactions, persons who have a complex ownership structure.

The assigned level of risk is scored in such a way that 2 points are assigned for each high-risk indicator at the client, and 1 point for each low-risk indicator. Additionally, each high-risk scoring (2 points) is weighted by a factor-weight of 2, and each low-risk scoring by a factor-weight of 1. If the sum of the weighted scores divided by the number of factors that were taken into account and evaluated, it gives a value greater than 2, the client belongs to the group of high-risk clients. If the sum of the weighted ratings divided by the number of factors that were taken into account and evaluated, gives a value of less than 2, the client belongs to the group of low risk clients.

Regardless of the above method of determining the level of risk for each client, high-risk clients include all persons who carry out suspicious and transactions without an economic basis.

## ARTICLE 6

In the event that the client and the relationship with him are assessed as risky, the Company will apply measures to mitigate the risk, in such a way that:

- identify the client in the manner prescribed by the Law, including the identification of the authorized person, and the founder and real owner in case the client is a legal entity, with the submission of the documentation prescribed by the Law and the rules of the Capital Market Commission and the Company;

- prikuplja zakonom definisane podatke o klijentima;
- na osnovu izjave klijenta utvrđuje porijeklo sredstava klijenta koje klijent koristi u trgovini finansijskim instrumentima;
- ukoliko se procijeni da je poslovanje klijenta rizično, te da izjava o porijeklu sredstava ne daje dovoljno garancija da sredstva potiču iz legalnih tokova, od klijenta može zahtijevati da drugim dokumentima dokaže porijeklo sredstava;
- vršiti aktivnosti u vidu ponovnih i produbljenih kontrola, zahtijevanjem dodatnih podataka od klijenta i kontinuiranim praćenjem poslovanja klijenta i vođenjem evidencija, te utvrđivanjem da li aktivnosti klijenta odgovaraju namjeri zbog kojeg je sklopio poslovni odnos sa Društvom i uobičajenim obrascem ponašanja klijenta;
- utvrditi postojanje osnova da se klijent svrsta u grupu politički eksponiranih lica na osnovu izjave klijenta;
- voditi evidenciju o svim transakcijama klijenta;
- ažurirati podatke o klijentu;
- čuvati podaci o klijentima u periodu ne kraćem od deset godina, pri čemu se podaci u elektronskom obliku čuvaju u aplikacijama i evidencijama koje su pokrivene šifrom, a dokumentacija u papiru u ormarima u prostorijama Društva koji se zaključavaju i kojima imaju pristup samo ovlaštena lica društva;
- praćenje poslovnog odnosa sa klijentom;
- vršiti ponovne i produbljene kontrole klijenata i poslovnih odnosa sa njima, koje će se u slučaju klijenata visokog rizika obavljati jednom godišnje, a u slučaju klijenata nižeg rizika sporadično ili u dužim intervalima;
- izvještavati nadležne organe i dostavljati podatke na njihov zahtjev ili u slučaju da se pojavi opravdana sumnja da je neka transakcija ili klijent direktno vezan za pranje novca i finansiranje terorizma;
- vršiti kontrolu procesa na osnovu Politike o internoj kontroli procesa, procedura i politika.
- collects legally defined data on clients;
- on the basis of the client's statement, it determines the origin of the client's funds that the client uses in trading financial instruments;
- if it is estimated that the client's business is risky and that the statement on the origin of the funds does not provide sufficient guarantees that the funds come from legal sources, the client may be required to prove the origin of the funds with other documents;
- carry out activities in the form of repeated and in-depth controls, by requesting additional data from the client and continuously monitoring the client's business and keeping records, and determining whether the client's activities correspond to the intention for which he entered into a business relationship with the Company and the client's usual pattern of behavior;
- determine the existence of grounds for classifying the client in the group of politically exposed persons based on the client's statement;
- keep records of all client transactions;
- update client data;
- store data on clients for a period of no less than ten years, whereby data is stored in electronic form in applications and records that are covered by a code, and documentation in paper in cupboards in the Company's premises that are locked and to which only authorized persons of the company have access ;
- monitoring the business relationship with the client;
- perform repeated and in-depth controls of clients and business relations with them, which will be carried out once a year in the case of high-risk clients, and sporadically or at longer intervals in the case of lower-risk clients;
- report to the competent authorities and submit data at their request or in the event that there is a justified suspicion that a transaction or client is directly related to money laundering and terrorist financing;
- perform process control based on the Policy on internal control of processes, procedures and policies.

**ČLAN 7**  
**ULOGI I ODGOVORNOSTI**

Za usvajanje ove politike i njene izmene i dopune odgovoran je Upravni odbor.

Lice koje je u organizacionoj strukturi i opisu poslova odgovorno za sprečavanje pranja novca i finansiranja terorizma obavlja sve poslove u vezi sa ovom Politikom. On je istovremeno odgovoran za praćenje propisa iz ove oblasti i usklađenost sa njima internih službenih dokumenata, kao i za izveštavanje u skladu sa tim propisom.

**ČLAN 8**

Ova Politika stupa na snagu danom donošenja.

**ARTICLE 7**  
**ROLES AND RESPONSIBILITIES**

The Board of Directors is responsible for the adoption of this policy and its amendments.

The person who, in the organizational structure and job description, is responsible for the prevention of money laundering and terrorist financing performs all tasks related to this Policy. At the same time, he is responsible for monitoring the regulations in this area and compliance of internal official documents with them, as well as for reporting in accordance with that regulation.

**ARTICLE 8**

This Policy enters into force on the date of adoption.