

## **REFUND POLICY**

Varalen Capital Markets LLC, a foreign company incorporated in USA under Company number 5263705, Registered in New York State (USA) 30 WALL STREET, 8TH FLOOR, NEW YORK, NY 10005-2205 , represented by its General Manager Michael Butcher, hereinafter referred to as the Company has developed this Refund Policy (hereinafter, the Policy) for the purpose of service quality improvement, minimization of financial and legal risks and compliance with the Policy for Anti-Money Laundering and Combating the Financing of Terrorism.

This Policy makes an integral part of the Customer Agreement published on the website of the Company: Customer Agreement.

When refilling your account using a bank card, you undertake not to apply to your bank or credit card provider for cancellation of the payment already credited to your trading account while using our services or after their termination. Any such attempt will be considered by the Company as violation of the Customer Agreement. If the Customer does cancel the payment, the Company reserves the right to withhold the current balance of the trading account and refund it until full payment of all the services and fees.

If your account shows no or insufficient trading activity during 1 month (the trading volume shall be determined by the Company individually), the Company reserves the right to refund the money to the payer. In this case the whole deposit amount shall be refunded.

The Company may refund payments received via any payment system, including credit/debit cards. In this case the funds are returned back to the same system/ credit/ debit card or to the same account from which they were received.

If the Company has reasons to suspect that the source of your funds and/or your activities as a whole contradict the Company's AML/CFT Policy, the Company reserves the right to refuse at its own discretion to deposit/withdraw the funds to/from your accounts within our systems, freeze them and refund to the payer. Please note that the Company shall inform the relevant authorities of any case of non-compliance with the AML/CFT Policy and will have the right to disclose your personal data strictly within the framework of cooperation with such authorities.

The Company will make every effort to prevent and block any attempts to deposit or withdraw money to/from your accounts by third persons. Only the account holder has the right to deposit or withdraw funds.

If, over the duration of our services, we consider your activities (especially depositing and withdrawing funds) as unusual or in conflict with the normal purposes of our users, where there is a direct or indirect fraudulent or illegal intention (behavior), the Company reserves the right to act under this document without giving you prior notice of any of its actions. In this case you shall indemnify the Company for any direct or indirect losses incurred by the Company as a result of your activities, in particular, for the costs and expenses related to the operations withholding the respective amounts from your funds.