

## Refund and Return Policy

The present rules determine the return of funds procedures and conditions apply to any outgoing transaction for the purpose of returning monetary funds to the client's trading account.

A return and refund policy outlines how, when, and under what conditions the Client can return the funds.

- The purpose of this policy is a prevention of conflicts between the Client and the Company, as well as reduction of risks related to AML, observance of the principles of the Policy of counteraction of money-laundering and countering of financing of terrorist activity.
- **Arow Invest** has the right to block an access to the private trading account, to suspend the trading activity, to cancel the demand for input-output transactions, or to make return of funds if the source of the following funds or activity of the Client contradicts the AML policy or financing terrorism activities.
- The trading market is highly volatile and may be affected by external factors such as financial, regulatory, or political events. Additionally, it can be vulnerable to hacks and thefts, they may be subject to government regulation. The potential for profits and loss can be substantial. A refund of the deposited funds, which were lost during trading activity could not be done.
- The Company doesn't cancel the processed transactions therefore the Company has the right to return money to the Client if no trading activity was recorded within a month since account replenishment.
- The Company has the right at certain objective reasons and in case of need to make return of funds, received through any payment system, including credit/debit cards. Thus, return of funds will be executed via crypto wallets or wire transfers that the customer used.
- In case the Company classifies the Client's activity as inappropriate one, indirect, illegal, unfair or it contradicts the Terms of Use, the Company has the right to take actions without informing the Client beforehand.
- The company will take all necessary measures to prevent and block both input, and withdrawal of funds by third parties. Input and output of funds from the account can be carried out only by the account holder itself.

- According to generally acceptable AML rules and regulations, the return must be performed only through the same bank account or Credit / Debit card that the customer used to deposit the funds.
- Without derogating of the foregoing, we may execute withdrawals to a different facility than the one used for the deposit, in accordance with Anti Money Laundering regulations.
- All compliance documentation must have been received and approved by the compliance officer in order to proceed the withdrawal.
- Beneficiary Name must match the name of the trading account. Requests to transfer funds to third party will not be processed.
- Repayment of any funds via wire transfer by the Company to the Client will be in the same currency and to the same account/credit card from which the funds were originally transferred, unless the Company has decided, by its own discretion, to return the funds to a different account of the Client.
- The Client will have no claim against the Company and will not hold the Company responsible for any delay and/or differences originating from a credit company's, banks or other financial institutions rates calculation and/or commission and/or any other debit.
- In the case the Client gives an instruction to withdraw funds from the Trading Account, financial department supervises every withdrawal request submitted. Identification documents must be submitted to process any withdrawal.
- The company does not take any responsibility for any delays of withdrawals, due to third party (banks, credit card companies or other service providers) policies, nor any force major events that are not under the company's control, including but not limited to lose or damage resulting, directly or indirectly, from any delays or inaccuracies on the transmission of orders or information due to a breakdown in, delay or failure of any transmission, communication or computing facilities.
- The time it takes for the money to reach your or Credit / Debit card or bank account that has been used to deposit funds may vary (usually up to five business days). Note that it might take longer for withdrawals to bank accounts due to the additional security procedures in force.
- Funds are released to your Credit / Debit card account once your Credit / Debit card merchant has debited the funds from our account. This process may take up to 5 business days or more to reflect on your Credit / Debit

card account balance. If you do not have online access to your Credit / Debit card, it should appear on the next billing statement(s) depending on your card's billing cycle.

- If the receiving bank uses an intermediary bank to send/receive funds, you may incur additional fees charged by the intermediary bank. These charges are usually placed for transmitting the wire for your bank. We are not involved with and nor has any control over these additional fees. Please comply with your financial institution for more information.
- Amount of withdrawal per Credit / Debit card is only allowable to an equal amount of money deposited per Credit / Debit card or less. Greater amounts must be wire-transferred to a bank account.

Please contact us with any questions, comments or for clarification