

Anti-Terrorism Financing and Anti-Money Laundering (AML) Policy

The Company provides financial services that involve transactions in the global financial markets, including the transfer and management of monetary assets. To comply with international laws and regulations, the Company has implemented stringent policies to prevent and detect illegal activities such as money laundering, tax evasion, financial fraud, embezzlement, and terrorism financing. This Anti-Money Laundering (AML) Policy is specifically designed to protect the Company from criminal activities and ensure that its operations are lawful and in compliance with relevant legal standards.

1. Compliance with Laws and Regulations

Money laundering is a serious criminal offense, and the Company treats it with utmost seriousness. The Company reserves the right to cooperate fully with law enforcement and regulatory authorities if it is determined that a Client is involved in such activities. To maintain the integrity of its operations, the Company adheres to a code of conduct and has implemented robust procedures, policies, and controls to detect, prevent, and mitigate financial crime, including money laundering and terrorism financing.

2. Know-Your-Client (KYC) Obligations

As part of its AML obligations, the Company enforces a Know-Your-Client (KYC) Policy, which mandates proper verification of each Client's identity. By engaging with the Company, the Client agrees to fully comply with both KYC and AML policies, ensuring that all transactions and business dealings with the Company are legally sound. The Company is obligated to conduct due diligence to verify the Client's identity and ensure that the source of funds is legitimate.

3. Disclosure of Funds and Source of Income

In line with the KYC Policy, Clients must disclose the source of funds they intend to deposit and use for trading, providing the necessary supporting documentation. The Company will maintain records of all financial transactions to monitor for suspicious or irregular activities. However, for security and privacy reasons, the Company reserves the right to withhold these records from the Client or any third parties if disclosure could facilitate illicit activities, in accordance with its legal and regulatory obligations.

4. Collection and Retention of Financial Records

By engaging in transactions with the Company, the Client authorizes the Company and its service providers to collect and retain financial records, which may be used to audit and report suspicious transactions to appropriate authorities. This includes submitting Suspicious Transaction Reports (STRs) as required by law to ensure compliance with AML regulations.

5. Internal Audits and Due Diligence

The Company's internal audit procedures are designed to ensure compliance with AML requirements. These include assessing the backgrounds of Clients, especially for politically exposed persons (PEPs), and evaluating whether the Client resides in a jurisdiction with inadequate AML or counter-terrorism financing controls. If any risk is identified, the Company will take appropriate action in accordance with applicable laws and regulations.

6. Risk-based Approach to Client Due Diligence

For Clients deemed low risk, the Company may simplify its due diligence process while ensuring compliance with all relevant procedures. For high-risk Clients, more stringent verification measures may be applied, including requests for additional documentation

or more frequent monitoring of transactions to ensure compliance with AML and counter-terrorism financing regulations.

7. Business Relationships and Third Parties

The Company will not enter into or maintain business relationships with anonymous or unidentified individuals. If a third party acts on behalf of the Client, they must provide a duly executed power of attorney, subject to the Company's approval. The Company reserves the right to invalidate any third-party transactions without prior notice to the Client if the transactions do not meet the Company's verification and authorization standards.

8. Refusal or Termination of Transactions and Relationships

In accordance with applicable legislation, the Company has the right to refuse or terminate any transaction or business relationship if the Client fails to provide the necessary documentation or information required under the AML and KYC policies. The Company also reserves the right to refuse to engage with any individual who fails to disclose the legitimate purpose of their transaction or provide the required background information.

9. Risk Factors and Financial Crime Prevention

The Company considers various risk factors when evaluating a Client's profile, including the nature of the Client's business, its legal structure, and the jurisdiction in which the Client operates. The Company may apply stricter measures if the Client engages in unusual financial activity or is located in a jurisdiction with weak AML enforcement. If the Client's activities are linked to illicit financial operations or the development of weapons of mass destruction, the Company may apply additional measures.

10. Internal Procedures for Verification

The Company's internal procedures will be enforced irrespective of the Client's personal relationship with the Company or whether they were referred by an employee or representative. These procedures ensure that all Clients comply with the same standards of verification and due diligence.

11. Legal Capacity of Clients

If the Client is found to have limited legal capacity, the Company will assess whether they are capable of using the Company's services. If the Client fails to meet the necessary legal requirements, the Company reserves the right to terminate the business relationship immediately.

12. Ongoing Monitoring and Compliance

To ensure continued compliance with AML and KYC regulations, the Company regularly updates and reviews Client data and transaction profiles. This includes monitoring for any signs of criminal activity or violations related to money laundering, terrorism financing, or other financial crimes. The Company ensures full compliance with all relevant laws and regulations.

13. Conclusion

The Company remains committed to upholding the highest standards of compliance with AML and KYC regulations, ensuring that all transactions are legitimate and in line with global financial crime prevention efforts. Clients are required to cooperate fully with the Company's policies and procedures, as outlined in this document, to facilitate a secure and legally compliant trading environment.