



## **KYC and AML Policy**

The Know Your Client (hereafter KYC) refers to the Know Your Client and Anti-money laundering (hereafter AML) refers to a set of laws, regulations, and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. These are regulation that companies must perform to identify their clients and ascertain relevant information pertinent to establish a financial business relationship with them.

### **Know Your Client**

#### **What is KYC**

KYC is an acronym for "Know your Client", and is mandatory regulatory requirement used for client identification process. Company will request documents to determine the true identity and beneficial ownership of accounts, source of funds, the nature of client's business, reasonableness of operations in the account in relation to the client's business, etc., in line with the Money Laundering and Terrorism (Prevention) regulations. The objective of the KYC guidelines is to prevent the financial system from being used, intentionally or unintentionally by criminal elements for money laundering.

As part of our discipline to comply with the AML Directives, Company have advanced the below Know Your Client (KYC) list which will guide Client as to the required information/documentation he will need to submit to be assessed and accepted as a client of the Company.

#### **Information required**

Each person, wishing to open a trading account, must submit documents confirming his/her identity and his/her residential address.

For natural persons the following information should be obtained:

- legal name and any other names used (such as maiden name),
- correct permanent address, the full address should be obtained, a Post Office box number is not sufficient (utility bill, tax assessment, bank statement, a letter from a public authority),
- telephone number, fax number, and e-mail address
- date and place of birth
- nationality
- occupation, public position held and/or name of employer

- an official personal identification number or other unique identifier contained in an unexpired official document (e.g. passport, identification card, residence permit, driving license) that bears a photograph of the customer,
- type of account and nature of the relationship,

For corporate entities (i.e. corporations and partnerships), the following information should be obtained:

- All statutory documents (Certificate of incorporation, memorandum and articles of association), and amendments to them (original or certified copies)
- Details on the shareholders, directors and ultimate beneficial owners (same details as those for natural persons described below)
- Powers of attorney for the persons carrying out interaction with the Company on behalf of the Customer (issuing orders, signing documents for opening the account and other procedures)
- confirmation of the bank transfer. The information of the bank account must be identical to (a) and (b) above. Otherwise, the deposit must be returned to the same bank account it came from, immediately, without crediting the trading account
- contact telephone and fax numbers,

### **Objectives of the KYC policy**

To prevent criminal elements from using the Company for money laundering activities.

Collecting and Recording information about Clients is essential to tailoring Company's service, and Company will collect and record all necessary information regarding current and prospective Clients including beneficial owners and other interested parties and will establish the purpose and intended nature of each relationship

Company collects above information in order to capacitate the clients and their financial transactions appropriately and enable them thereby to manage risks readily and to implement sufficient controls for detection and reporting of suspicious and/or potentially illegal activities in accordance with the applicable laws and procedures.

### **Step of Verifying Clients Information**

Verification of identity is a process carried out to ensure that a person is who they claim to be. Verifying Clients Information Company will take reasonable and appropriate measures to verify the key information provided by prospective Clients to reliable independent sources. For relationships that represent a higher level of risk Company may perform additional verification activities. The purpose of carrying out verification of identity is to reduce the risk of identity fraud and the registration of fraudulent land transactions and Company refuses to enter into or

relationships or conduct transactions with any persons or entity that provides false, inconsistent or conflicting information.

### **Importance to comply with KYC procedures**

KYC procedure is part of the anti-money laundering laws and regulations, which aim to prevent the practice of generating income through illegal and criminal actions.

### **Privacy**

Company is committed to protecting your privacy. All the information that Client share with Company is confidential. Company only collects personal information from clients in order to comply with the prevalent Laws and Regulations. Company doesn't share your information with any outside parties. For more information, read our privacy policy, which is available on our website.

### **Anti-money laundering**

Anti-money laundering and terrorist financing prevention affiliates to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Company is committed to the highest standards of the AML compliance and Terrorist Financing Prevention by requiring its officers, employees, and affiliates to adhere to these standards in preventing the use of its products and services for money laundering purposes.

Company is committed to full compliance with all applicable laws and regulations regarding anti-money laundering procedures. Company has adopted and will enforce these provisions set forth in Anti-Money Rules & Regulations in order to prevent and detect money laundering, terrorist financing and other illegal activities.

### **What is money laundering**

Money laundering involves the placement of illegally obtained money into legitimate financial systems so that monetary proceeds derived from criminal activity are transformed into funds with an apparently legal source. Money laundering is also generally defined as engaging in acts

designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have been derived from legitimate origins or constitute legitimate assets.

### **How Company contributes to fighting money laundering and terrorist financing**

Company make sure that each employee, whose duties are associated with the provision of products and services of the Company, and who directly or indirectly deals with the Client, knows the requirements of the applicable regulations which affect his or her job responsibilities, and it shall be the affirmative duty of such employee to carry out these responsibilities at all times in a manner that complies with the requirements of the relevant laws and regulations. The employee will also ensure that the firm keeps and maintains all of the required AML records and will ensure that Clients conduct is being monitored.

The employee is vested with full responsibility and authority to enforce AML Policy. Company perform all the required measures to prevent and detect money laundering and terrorist financing,

The employee obligations from the previous paragraphs of this Policy include:

1. Assessment of risks of misuse for money laundering and financing of terrorism for a Client, business relationship, transaction or product
2. Due diligence of the Client in a manner and under conditions defined by this Policy.
3. Taking measures for prevention and detection of money laundering and terrorist Financing
4. to undertake training programs on anti-money laundering policies and procedures.
5. To get trained in how to recognize and deal with transactions which may be related to money laundering,
6. To timely escalate and report the matter to the senior officer,
7. To get themselves acquainted with Anti Money Laundering Rules & Regulations,
8. To comply with the requirements of Rules & Regulations.

### **Maintenance and Confidentiality**

Company will hold any supporting documentation confidential. Copies of all documents related to Company Client Identification Procedures will be retained for an appropriate period of time and, at a minimum, the period of time required by applicable law or regulation. The documents

Company retains are copies of documents reviewed in connection with Client Identification Procedures or enhanced due diligence procedures, Client identification checklists, if any, or similar due diligence documentation, and any other documents required to be retained by applicable anti-money laundering legislation.

### **Continues monitoring of activities**

In addition to gathering information from the clients, Company continues to monitor the activity of every client to identify and prevent any suspicious transactions. Company will carefully monitor account activity for unusual size, volume, pattern or type of transactions, taking into account risk factors and red flags that are appropriate to our business.

For each client Company will assess risk of money laundering or terrorist financing. Risk analysis is a procedure in which the Company defines the evaluation of the likelihood that his business could be misused for money laundering or terrorist financing, and the criteria, which will be the particular Client, business relationship, product or transaction be classified as more or less risky in the field of money laundering or terrorist financing. It is important to Company that Company obtain sufficient information about each Client to allow Company to evaluate the risk presented by that Client and to detect and report suspicious activity. In assessing the risk of the Client, business relationship, product or transaction, Company will take into account the following criteria:

1. The type, business profile and structure of the Client.
2. Geographical origin of the Client.
3. The nature of the business relationship, product, or transaction.
4. Experience with the Client.

Company will define the risk category by criteria defined in this Policy, under which the implementation of measures in the analysis of the Client, certain clients, business relationship, product or transaction considered, a risk category will be assigned. In determining the risk category Company may, with respect to the criteria of risk, classifies particular client, business relationship, product or transaction as a high risk of money laundering or terrorist financing, and will make a deep analysis of the Client. In evaluating the risk, the Company will use the list of indicators for identifying suspicious transactions and in relation to which there are reasons for suspicion of money laundering or terrorist financing.

### **Identifying and Reporting Suspicious Activity**

The first action by any employee who suspects suspicious activity is to escalate the matter to the AML Officer. Under no circumstance should any of the parties be informed before, during or after

any investigation whether formally reported or not. The Officer should assess any report and decide whether to escalate the matter.

### **Review and Updating**

This Policy reflects the firm's current risks. It will be reviewed annually or sooner in the event of needed changes to ensure that it is functioning as designed.