

# Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy

To support the detection, prevention, and reporting of suspicious financial activities, the Company has implemented a strict Anti-Money Laundering (AML) policy. This policy includes notifying relevant authorities when suspicious activity is identified, although the Company is not permitted to inform clients when such notifications are made. An advanced digital system has also been introduced to verify client identities and to maintain a comprehensive record of all transactions.

As part of its anti-money laundering efforts, the Company neither accepts nor disburses cash under any circumstance. Additionally, it reserves the right to freeze or halt transactions it considers suspicious or potentially linked to unlawful activities, based on internal evaluations.

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## Company Procedures

The Company ensures all clients are genuine individuals or legal entities by complying with all regulatory standards set by financial authorities. The AML framework is enforced through:

- A robust Know Your Customer (KYC) and client verification process
- Ongoing monitoring of client transactions
- Comprehensive recordkeeping practices

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## KYC & Due Diligence

In line with the Company's commitment to AML/KYC protocols, every client must complete a verification process before initiating any activity.

Cooperation with clients begins only after satisfactory evidence of identity is provided. Enhanced due diligence is applied to clients from jurisdictions identified as having insufficient AML safeguards or those posing a high risk

of financial crime or corruption. This also applies to beneficial owners residing in such regions or whose funds originate from these areas.

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## Individual Client Verification

During account registration, individuals must submit personal documents as follows:

### Proof of Identity (POI)

Acceptable documents include:

- Passport
- National ID Card (if passport unavailable)
- Alien ID Card (alternative to passport)
- Other government-issued photo identification (evaluated on a case-by-case basis)
- Reference letter from a regulated entity (e.g., bank, lawyer, accountant, or government body)

Requirements for POI:

- Must state full legal name
- Must be valid and issued within the last 10 years
- Must display ID number, issue/expiry dates, date of birth, and country of issue
- Signature (if applicable)

### Proof of Residence (POR)

Acceptable documents (dated within the last 3 months) include:

- Utility bill (electricity, water, gas, phone—mobile phone bills accepted only if details match registration info)
- Bank statement
- Mortgage statement
- Valid lease/rental agreement
- Homeowner/renter's insurance bill
- Security system invoice

- Government-issued correspondence confirming address (e.g., tax notices, voter registration, jury summons)

**Important Notes:**

- POI and POR must be separate documents
- All documents must be translated (if applicable)
- POR must show the client's current address, full name, and come from a verifiable source

**Additional Proof for Local Residents:**

- Municipality or land registry documents

**Additional Proof for Non-Residents:**

- One-year lease contract or a letter from employer verifying client's housing arrangement and employment

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## Joint Accounts

For joint accounts, both parties must undergo full verification. Once the internal Joint Account Application Form is completed and signed by both parties, the following documentation is required:

- Marriage certificate (for spouses)
- Birth certificate (for first-degree family relationships)
- Joint bank account statement and supporting documents (for non-relatives)

Both individuals must submit personal identification and residence verification as outlined above. If more documents are needed, the clients will be notified by email.

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# Corporate Accounts

Entities opening corporate accounts must provide:

- Certificate of Incorporation
  - Registered Office Certificate
  - Articles and Memorandum of Association
  - Certificate of Good Standing/Incumbency
  - Director and Secretary Certificate
  - Shareholder Certificate
  - Board Resolution approving the account and designated operators
  - POI and POR (less than 3 months old) for all key persons (shareholders, directors, secretaries, UBOs)
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## Transaction Monitoring

In addition to collecting required documentation, the Company continuously monitors all client activity to identify irregular behaviour. Transactions that deviate from a client's usual activity or legitimate business practices may be flagged as suspicious and investigated further.

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## Deposit and Withdrawal Guidelines

To ensure financial integrity, the following requirements apply to all fund transfers:

- The account holder's name must match the name used during registration when depositing via bank transfer or credit/debit card
- Withdrawals must be made using the same method and to the same account used for deposits, at least until the original deposited amount is returned
- If the deposit method doesn't support withdrawals, an alternative approved method (such as a bank transfer to the verified account holder) will be used, pending identity verification

- For deposits made through multiple payment channels, withdrawals will be processed proportionally based on the deposit size from each method
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