

## **AML & KYC POLICY**

A policy counteracting money laundering and financing terrorist activities has been developed by ATFX FAMILY GROUP LLC a company having its registered office at: Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, St. Vincent and the Grenadines, registration number 903 LLC 2021; in order to carry out a battle with sponsorship of terrorism and money laundering, reduce financial and legal risks of the Company, implementation of appropriate measures aimed at preventing the risk of money laundering and terrorist financing. The company strictly complies with all applicable laws and regulations of anti-money laundering (AML) and countering the financing of terrorism (CFT) policies. This document sets out the measures and plans, which will be implemented by us in respect of the aforementioned objective.

### **1. Requirements and adhering to AML/CFT.**

#### **1.1. Due Diligence Measures for Clients (CDD).**

**1.1.1.** When establishing a business relationship with a claimant upon business and on an ongoing basis, the Company will apply the appropriate CDD measures in the business relationship, including identification and verification of the applicant's identity for business.

**1.1.2.** The Company will carry out the CDD for:

- a) a client;
- b) a client's beneficial owner;
- c) any person acting on behalf of a client.

**1.1.3.** A client who is a private person, and whom the Company reasonably trusts that he/she does not act on behalf of another person, shall be treated as if he or she is a beneficial owner, if the Company does not have reasonable grounds to suspect that the client is not a beneficial owner.

**1.1.4.** According to a quality risk profile, the Company executes a standard CDD, simplified CDD and a more severe CDD.

#### **1.2. Basis for verification.**

The Company shall carry out verification:

- on the basis of documents, database, or information issued by a reliable and independent source;
- on any other basis relating to the indicated situation, client, product, service, business relationship or transaction as may from time to time be prescribed by Law.

#### **1.3. Individuals.**

The Company will collect the relevant identification data about an individual, including:

- a person's full name;
- place and date of birth of a person;
- current address of a person's residence (P.O. box address will not be accepted);
- nationality;
- any occupation, social position occupied and employer's name if available.

### **1.3.1. Individual identity verification.**

The Company recognizes and guarantees that all collected identification details must be checked. Identification documents will be received and kept to verify information provided by managers about their personality. The documents must be either original or properly certified, and must contain a photo of a manager. When identifying a personality of an individual, the Company shall rely on the following types of documentation:

- internal identity documents;
- currently valid passports;
- currently valid driver's license.

### **1.3.2. Individual's address verification.**

When verifying an individual's address, the Company may rely on the following types of documentation:

- a recent utility bill;
- a recent bank statement or credit card statement;
- recent bank references (the term "recent" stands for the past three (3) months).

Alternatively, verification may be carried out by:

- receipt of a recommendation from a professional person who knows an individual (the recommendation must include the person's permanent address of residence);
- current list of electors checks;
- use of address verification service;
- a person's visits of his/her current address of residence.

## **1.4. Person other than an individual.**

**1.4.1.** Legal entities include corporate bodies, partnerships, associations or any other entity except for legal agreements.

**1.4.2.** When an applicant for business is a legal entity, the Company:

- ensures that it understands the structure of ownership and control of the applicant for business;
- check and verify the existence of a legal entity;
- will determine the identity of a legal entity managers.

**1.4.3.** For the purposes of paragraph 1.4.2 above, managers of applicants for business include the following persons:

- organizers;
- beneficial and final beneficial owners;
- officials;
- inspectors;
- company's directors.

**1.4.4.** The Company shall:

- identify and verify the identity of a legal person, including the name, date of registration, date and country of registration or entry in register;
- identify and verify registered office address and principal place of business (if it differs from registration office);
- check a legal person's legal status;

- identify and verify principal managers' identity (including beneficial owners, supervisors, director or equivalent position) having ultimate effective control over capital or a legal entity's assets;

- check that any person who intends to act on behalf of a legal entity, has an appropriate permission for that, and identify that person.

**1.4.5.** If the principal managers are not natural persons, the Company shall establish the identity of individuals who ultimately own or control the business and check their identity in accordance with the requirements set out in this document in general in relation to natural persons.

**1.4.6.** Identification and verification requirements applicable to legal entities may be fulfilled in various ways depending on applicant's nature, i.e. in respect of private companies, trusts and partnerships:

**1.4.6.1.** Private companies:

- obtainment of original or duly certified copy of a company's incorporation certificate or entry in register;

- verification of corresponding registration of companies, that a company continues to exist;

- reviewing of the latest report copy and accounts if available (audited, where applicable);

- obtainment of details about the registered office and place of business;

- verification of identity of the company's executives as mentioned previously.

**1.4.6.2.** Partnership:

- receipt of original or a duly certified copy of a partnership agreement;

- if a partnership has been registered, verification of the relevant registration that the partnership continues to exist;

- receipt of the latest report copy and accounts;

- confirmation of a partnership business nature in order to ensure its legality;

- verification of executives' identity as mentioned previously.

**1.4.6.3.** Trusts:

1.4.6.3.1. Trusts do not have a separate legal entity, and therefore business relationships are formed through their business. A trustee of a Trust enters into a business relationship on behalf of the Trust and should be considered as the client along with the Trust.

1.4.6.3.2. When a Trust is an applicant for business, the Company shall

- (1) ensure that it understands the structure of ownership and control of the claimant upon business;

- (2) check and establish the existence of the Trust, and

- (3) determine the identity of the Trust's executives.

In the context of this paragraph, the executives include:

- capital founders and participants;

- trustees;

- beneficiaries;

- defensors.

1.4.6.3.3. When identifying and verifying a Trust, the Company shall:

- receive original or a duly certified copy of a trust agreement or the relevant extracts from the agreement;
- if a Trust is entered into a register - check the relevant register to ensure that the Trust does exist;
- obtain the details of the legal office and place of business of a Trust;
- verify executives' identity of a Trust as mentioned previously.

If a claimant upon business is a company, a Trust, a partnership or any other organization, the Company will always verify the identity of the final executives-individuals of such candidates in the same way as the identity of clients who are natural persons.

## **2. Identification and verification of clients.**

**2.1.** According to AML and KYC (Know Your Client) policies, the Company identifies the Client and verifies their true identity on the basis of documents and data both at the moment of starting a business relationship with the Client and on ongoing basis.

**2.2.** While the registration process the Client provides the identification information to the Company including the Client's full name, date of birth, country of residence, mobile number and e-mail.

**2.3.** After receiving the identification information, the Company should verify the information requesting the appropriate documents.

**2.3.1.** The appropriate document verifying the Client's identity is a high resolution scanned copy or a photo of a passport or a driving license or any other national ID.

**2.3.2.** The appropriate document verifying proof of address is a high-resolution copy or a photo of a utility bill or a bank reference issued within the last 3 months.

**2.4.** At the Company's request the Client is required to provide a scanned copy or a photo of front and back side of the credit/debit card. The front side should show the cardholder's full name, the expiry date and the first six and the last four digits of the card number. The back side should show the cardholder's signature, CVC2/CVV2 code must be covered.

**2.5.** The Company shall monitor the Client due diligence and accounts on the regular basis in order to determine the level of risk they pose and to reveal whatever changes in information about the Client.

**2.6.** If the Company believes the business relationship with the Client to pose a potentially high risk of money laundering or terrorism financing, the Company is entitled to ask for whatever additional data and documents that may be deemed necessary in the situation.

**2.7.** The Client is obliged to inform immediately of any changes in the personal or contact information.

## **3. Payment policy.**

**3.1.** In order to minimize the risk of money laundering and terrorism financing the Company neither accepts nor pays off cash money under no circumstances.

**3.2.** The Company reserves the right to refuse processing a transaction at its any stage, if the Company believes the transaction to be connected in any way with money laundering or criminal activity.

**3.3.** According to international legislation, the Company is prohibited from informing the Client that they have been reported for suspicious account activity.

**3.4.** The name of a person making a deposit of funds should be the same as the Client's name in the Company's records. Payments from third parties are not accepted.

**3.5.** The Company requires strict adherence to established deposit/withdrawal procedure. Funds can be withdrawn to the same account and using the same method as when depositing. When withdrawing, a name of a payee should be the same as the Client's name in the Company's records. If the deposit has been made via wire transfer, the funds should be withdrawn via the same transfer to the same bank and to the same bank account as when depositing. If the deposit has been made by means of a payment system, the funds can be withdrawn via online transfer to the same payment system and to the same account as when depositing.

**3.6.** The compliance with the AML policy requires withdrawal of funds to be made in the same currency as when depositing.

**3.7.** The Company maintains transaction records for a minimum of 5 years after termination of the business relationship with the Client.

## **4. Personnel training.**

**4.1.** The Company appoints an AML Compliance Officer who is fully responsible for the Company's compliance with CFT and AML policies, establishing and maintaining the Company's AML program, AML training employees, receiving, investigating and maintaining internal suspicious activity reports.

**4.2.** All the employees, managers and directors of the Company are suitably vetted while entering into employment.

**4.3.** Employees who are dealing with clients or are involved in any AML checking, verification or monitoring undergo AML training. Each new employee has to follow an AML training plan. The AML training program includes suspicious transactions identification training as well as training in prevention, detection and reporting of money laundering and terrorism financing crimes.

**4.4.** Any violation of the AML policy must be reported to the AML compliance officer, unless the violation implicates the AML Compliance Officer, in which case an employee must report the violation to the CEO.

## **5. Introducing changes to the AML policy.**

**5.1.** Company reserves the right to review and/or amend the AML Policy, at its sole discretion, so please re-read it regularly. If the Client continues to use the website services or visits it, they agree automatically with changes introduced to the Policy.