

KYC/AML Policies

FxWinning Limited Group is committed to the highest standards of anti-money laundering (AML) and counter-terrorist financing (CTF) compliance.

Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) compliance standards.

The objective of the Group's

Anti-Money Laundering and Counter Terrorist Financing Policy is to actively prevent the risks of these issues.

risks of these issues. To assist the government in combating the financing of terrorism and money laundering activities, the

money laundering activities, the law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account. We are required to

obligation to report suspicious customer activity relevant to money laundering.

Money laundering: the process of converting funds received from illegal activities (such as fraud, corruption, terrorism, etc.) into cash,

corruption, terrorism, etc.) into other funds or investments that appear legitimate in order to conceal or distort the real source of funds.

distorting the real source of funds.

The money laundering process can be divided into three sequential stages:

- **Placement.** In this stage, the funds are converted into financial instruments, such as checks, bank accounts and money transfers, bank accounts and money transfers, or can be used to purchase high-value goods that can be resold.

can be resold. They can also be physically deposited in banks and non-bank institutions (e.g., bureaux de change).

exchange houses, for example). To avoid suspicions on the part of the company, the launderer can also

may also make several deposits instead of depositing the full amount at once, this form of placement is called smurfing.

is called smurfing.

- **Layering.** Funds are transferred or moved to other accounts and other financial instruments. It is

is done to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions.

financial transactions. Moving funds and changing their form makes it complicated to trace the money being laundered.

being laundered.

- **Integration.** Funds are re-circulated as legitimate to purchase goods and services.

"FxWinning Limited" adheres to the principles of Anti-Money Laundering and actively prevents any actions that target or facilitate money laundering.

actively prevents any action that targets or facilitates the process of legalization of illegally obtained funds.

illegally obtained funds. The AML policy means to prevent the use of the company's services by criminals for the purpose of money laundering.

criminals for the purpose of money laundering, terrorist financing or other criminal activity.

To prevent money laundering, "FxWinning Limited" does not accept or pay in cash under any circumstances.

under any circumstances. The company reserves the right to suspend the operation of any client,

which may be considered illegal or, in the opinion of the staff, related to money laundering.

Company Procedures

"FxWinning Limited" will ensure that it is a real or legal person.

"FxWinning Limited" also performs all necessary measures in accordance with the applicable laws and

applicable laws and regulations issued by the monetary authorities. The AML policy is being **FxWinning Limited's** FX by the following means:

- knowing your customer's policy and due diligence.
- monitoring customer activity
- Record keeping

Know your customer: due to the company's **commitment to AML and KYC** policies, each customer of the company is required to complete an AML and KYC due diligence procedure.

of the company must complete a verification procedure. Before

"FxWinning Limited" initiates any cooperation with the client, the company ensures that satisfactory evidence is submitted or

satisfactory evidence is presented or other measures are taken to produce satisfactory evidence of the identity of any customer or counterparty.

identity of any client or counterparty. The company also applies heightened scrutiny to customers who are residents of other countries.

customers, who are residents of other countries, identified by credible sources as countries, which have inadequate AML standards or which may have inadequate

inadequate AML standards or which may pose a high risk of crime and corruption, and to beneficial owners who reside in and whose

beneficial owners who are resident in and whose funds are sourced from named countries.

Individual Clients

During the registration process, each customer provides personal information, specifically: full name; date of birth; country of origin; and complete residential address.

date of birth; country of origin; and complete residential address. The following documents are documents are required to verify personal information: A client submits the following

documents (in case the documents are written in non-Latin

documents (in case the documents are written in non-Latin characters: in order to avoid delays in the verification process, it is

verification process, it is necessary to provide a notarized translation of the document in English) due to KYC requirements.

English) due to KYC requirements and to confirm the information provided:

- Valid passport (showing the first page of the local or international passport, where the photo and signature are clearly visible.

photo and signature are clearly visible); or

- Driver's license with photo; or

- National identity card (showing front and back);

- Documents proving current permanent address (such as utility bills,

bank statements, etc.) containing the customer's full name and place of residence. These

These documents must not be older than 3 months from the date of submission.

Corporate Clients

In case the applicant company is listed on a recognized or approved stock exchange or when there is independent evidence to show that there is independent evidence demonstrating that the applicant is a wholly owned subsidiary or a subsidiary under the control of such company.

a subsidiary under the control of such a company, no further steps will normally be taken to verify identity.

necessary. In the event that the company is not listed and none of the principal directors or shareholders already have an account with FICOM.

shareholders already have an account with "**FxWinning Limited**", the following documentation must be provided.

documentation:

- Certificate of Incorporation or any national equivalent;
- Memorandum and Articles of Association and statutory declaration or any national equivalent; Memorandum and Articles of Association or any national equivalent; Memorandum and Articles of Association and statutory declaration or any national equivalent national equivalent;
- Certificate of good standing or other proof of the company's registered address;
- Resolution of the board of directors to open an account and confer authority on those who will operate the account; Certificate of good standing or other evidence of the company's registered address to operate it;
- Copies of powers of attorney or other authorities granted by the directors in connection with the company;
- Proof of the identity of the directors in the event that they deal with.

"FxWinning Limited Group on behalf of the Client (in accordance with the individual identity verification rules described above); Proof of identity of the directors in the event that they deal with FxWinning Limited Group on behalf of the Client.

individual identity verification rules described above);

- Proof of identity of the beneficial owner(s) and/or the person(s) under whose instructions the account signatories are empowered to act (in accordance with the individual identity verification rules described above); Proof of identity of the beneficial owner(s) and/or the person(s) under whose instructions the account signatories are empowered to act (in accordance with the individual identity verification rules described above).

Customer Activity Tracking

In addition to collecting information from customers, "FxWinning Limited Group" continues to monitoring each customer's activity to identify and prevent any suspicious transactions.

A suspicious transaction is referred to as a transaction that is not consistent with the customer's legitimate business or historical

or with the customer's usual customer transaction history known to monitor the customer's activity.

the customer's activity. "FxWinning Limited Group" has implemented the system of monitoring of the named transactions (both automated and, if necessary, manual) to prevent criminals from using the services of the company's services.

Record Keeping

Records must be maintained of all transaction data and data obtained for the purpose of identification purposes, as well as all documents related to money laundering issues (e.g., files on suspicious activity reports).

(e.g., suspicious activity report files, AML account monitoring documentation, etc.).

AML account monitoring documentation, etc.). These records are retained for a minimum of 7 years after the account is closed.

account is closed

Actions taken

In cases of an attempt to execute transactions that "**FxWinning Limited Group**" suspects are related to money laundering or other criminal activity, it shall

money laundering or other criminal activity, it will proceed in accordance with the applicable law and report the suspicious

applicable law and report the suspicious activity to the regulatory authority. "FxWinning Limited Group" reserves

reserves the right to suspend the operation of any client, which may be considered illegal or may be related to money laundering.

may be related to money laundering in the opinion of the staff. "FxWinning Limited Group" has full discretion to temporarily block a suspected client's account or terminate an existing client relationship.

relationship with an existing client. For more information you can contact us at support@fxwinning.net

FxWinning Limited is committed to the highest standards of the Anti-Money Laundering (AML) compliance and Counter-Terrorism Financing (CTF). The aim of the Companies Anti Money Laundering and Terrorist Financing Policy is to actively prevent the risks of these matters. To help the government fight the funding of terrorism and money laundering activities, law requires all financial institutions to obtain, verify, and record information that identifies each person opening an account. We are under the obligation to report suspicious activities of clients relevant to money laundering. Money laundering – the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments that look legitimate to hide or distort the real source of funds. The process of money laundering can be divided into three sequential stages: • Placement. At this stage, funds are converted into financial instruments, such as checks, bank accounts, and money transfers, or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make several deposits instead of depositing the whole sum at once, this form of placement is called smurfing. • Layering. Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace the money being laundered. • Integration. Funds get back into circulation as legitimate to purchase goods and services. FxWinning Limited adheres to the principles of Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalizing of illegally gained funds. AML policy means preventing the use of the company's services by criminals, with the aim of money laundering, terrorist financing or other criminal activity. To prevent money laundering, FxWinning Limited neither accepts nor pays cash under any circumstances. The company reserves the right to suspend any client's operation, which can be

regarded as illegal or, may be related to money laundering in the opinion of the staff. Company Procedures FxWinning Limited will make sure that it is dealing with a real person or legal entity. FxWinning Limited also performs all the required measures in accordance with applicable law and regulations, issued by monetary authorities. The AML policy is being fulfilled within FxWinning Limited FX by the following means:

- know your customer policy and due diligence
- monitoring client's activity
- record keeping

Know your customer: Because of the company's commitment to the AML and KYC policies, each client of the company has to finish a verification procedure. Before FxWinning Limited starts any cooperation with the client, the company ensures that satisfactory evidence is produced or such other measures that will produce satisfactory evidence of the identity of any customer or counterparty are taken. The company as well applies heightened scrutiny to clients, who are residents of other countries, identified by credible sources as countries, having inadequate AML standards or that may represent a high risk for crime and corruption and to beneficial owners who resides in and whose funds are sourced from named countries.

Individual clients During the process of registration, each client provides personal information, specifically: full name; date of birth; country of origin; and complete residential address. The following documents are required in order to verify the personal information: A client sends the following documents (in case the documents are written in non-Latin characters: to avoid any delays in the verification process, it is necessary to provide a notarized translation of the document in English) because of the requirements of KYC and to confirm the indicated information:

- Current valid passport (showing the first page of the local or international passport, where the photo and the signature are clearly visible); or
- Driving licence which bears a photograph; or
- National identity card (showing both front and back pages);

Documents proving current permanent address (such as utility bills, bank statements, etc.) containing the client's full name and place of residence. These documents should not be older than 3 months from the date of filing.

Corporate clients In case the applicant company is listed on a recognised or approved stock exchange or when there is independent evidence to show that the applicant is a wholly owned subsidiary or a subsidiary under the control of such a company, no further steps to verify identity will normally be required. In case the company is unquoted and none of the principal directors or shareholders already has an account with FxWinning Limited, the following documentations must be provided:

- Certificate of Incorporation or any national equivalent;
- Memorandum and Articles of Association and statutory statement or any national equivalent;
- Certificate of good standing or other proof of registered address of the company;
- Resolution of the board of directors to open an account and confer authority on those who will operate it;
- Copies of powers of attorney or other authorities given by the directors in relation to the company;
- Proof of identity of directors in case he/she will deal with FxWinning Limited on behalf of the Customer (according to the Individual identity verification rules described above);
- Proof of identity of the beneficial owner(s) and/or the person(s) on whose instructions the signatories on the account are empowered to act (according to the Individual identity verification rules described above).

Monitoring of client activity In addition to gathering information from the clients, FxWinning Limited continues to monitor the activity of every client to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is inconsistent with the client's legitimate business or the usual client's transaction history known from client activity monitoring. FxWinning Limited has implemented the

system of monitoring the named transactions (both automatic and, if needed, manual) to prevent using the company's services by criminals. Record keeping Records must be kept of all transaction data and data obtained for the purpose of identification, as well as of all documents related to money laundering topics (e.g. files on suspicious activity reports, documentation of AML account monitoring, etc.). Those records are kept for a minimum of 7 years after the account is closed. Measures taken In cases of an attempt to execute transactions which FxWinning Limited suspects that are related to money laundering or other criminal activity, it will proceed in accordance with the applicable law and report suspicious activity to regulating authority. FxWinning Limited reserves the right to suspend any client's operation, which can be regarded as illegal or may be related to money laundering in the opinion of the staff. FxWinning Limited has complete discretion to temporarily block the suspicious client account or terminate an existing client relationship. For more information you can contact us at support@fxwinning.net