

EFIXXEN.COM

# ANTI-MONEY LAUNDERING POLICY



EFIXXEN

© 2023 EFIXXEN. ALL RIGHTS RESERVED.

## AML POLICY

---

1. The Company provides trading services that involve transactions in the financial markets and consequently engage in money. Therefore, the Company has established policies to maintain its international operation lawfully and comply with the relevant legislation. The main objective of the Anti-money Laundering (“AML”) Policy is to sift unlawful activities such as financial fraud, tax evasion, embezzlement, terrorist financing, and other operations that involve covering the origin of illicitly acquired money.
2. Money laundering is a serious financial crime, and the Company invokes its right to cooperate with the relevant authorities if the Client is proven involved in any laundering operations. By all means, the Company observes a code of conduct, procedures, and policies to detect and prevent any financial crime within its business operations.
3. In line with the AML Policy, the Company strictly adheres to its Know-Your-Client (“KYC”) Policy that verifies the Client’s identity. The Client hereby agrees that he/she will fulfill the obligations under the KYC and AML Policies to persist in legal business operations with The Company. In compliance with the code of conduct, the Company must ensure proper identification of Clients participating in its transactions.
4. As stated in the KYC Policy, the Client must disclose his/her source of funds, which will be used to trade with the Company, and submit the indicated documents therein. In addition to submitting the required documents, the Company shall keep records of the Client’s financial transactions to track the daily operations. However, for privacy and security reasons, the Company has the right to refuse requests to provide those records to prevent illegal use.
5. By performing transactions with the Company, the Client thereby agrees and authorizes the Company and its service providers to collect those records. The Company uses the obtained records to audit the Suspicious Transaction Reports submitted to the relevant administration.
6. The Company’s internal audit includes internal control regulations and a code of conduct for applying the Client with due diligence measures, especially if the Client is a politically exposed individual. The internal audit also identifies if the Client resides in a country without ample means to prevent money laundering and terrorist financing or if the Client is found involved. Moreover, other international sanctions imposed on the Client also apply.
7. If the Client’s risk level is low, the Company may simplify its due diligence measures but will not entirely disregard the relevant procedures. On the other hand, if the Client’s risk level is high, the Company reserves the right to apply additional measures to verify the Client’s identity and background.



8. In observation of preventing unusual and unlawful transactions, the Company will not enter into operations or establish relationships with anonymous or unidentified users. In the event of transactions performed by a third party on behalf of the Client, the relevant individual must present a power of attorney subject to the Company's approval. The Company reserves the right to invalidate third-party transactions without notice.

9. The legislation authorizes the Company to waive operations and terminate transactions with any user if he/she does not provide sufficient information or the appropriate documentation. The Company invokes its right to refuse to deal with any individual who does not disclose his/her transaction purpose and other relevant background information.

10. The Company takes the following cases into account to better prevent illegal financing operations and to assess if the Client has a higher risk level:

- A.) The Company is required to identify if the Client's risk arises from his/her field of activity, including its legal form and management structure, and whether the Client is part of a civil law partnership or a trust fund.
- B.) One factor of prevention is identifying if the Client's original or current residency is registered in a territory with a low tax rate or where the regulations for unlawful financing are not minutely enforced. The Company may also consider countries that cooperate with criminal groups or whether the criminal groups use the country to pursue operations.
- C.) The Company reserves the right to tighten verification measures if the transactions with the Client seem unusual or economically impracticable. These transactions include constant change of information, a rapid increase of capital, and rendering services to anonymous third parties.
- D.) Stricter measures may be applied if the Client's background provides for developing weapons related to mass destruction or any crime if the Client participates in other cash-play operations, such as currency exchange locations and gambling operations.

11. Even if the Company knows the Client personally, or the Client or any individual that uses the Company's services is a referral from Efixxen's employee or representative, the internal procedures and policies must not be disregarded.

12. In case the Client has a limited legal capacity, the Company shall evaluate the Client's condition and whether he/she can still use the Company's services. If the Company finds the Client unable to perform the most critical conditions, the Company reserves the right to terminate any business relationship with the Client immediately.

13. The Company regularly updates the data records and operating profile of the Clients to ensure the validity of each Client's risk level and if the Client is free of criminal records, especially relating to financial activities.





© 2023 EFIXXEN. ALL RIGHTS RESERVED.

[support@efixxen.com](mailto:support@efixxen.com)