

## AML POLICY

This Policy is intended to inform that **SOCAL TRADE LTD** ("Company") strictly adheres to all applicable laws and regulations related to Anti-Money Laundering AML and Countering the Financing of Terrorism policies. In compliance with these regulations, the Company undertakes a series of measures designed to identify and prevent the use of criminally-obtained funds, as well as to implement effective countermeasures against their legalization. These actions are carried out in accordance with international standards and best practices, ensuring that the Company plays its role in the global fight against financial crimes.

Date of the latest update: 21.06.2024.

### 1. IDENTIFICATION AND VERIFICATION OF CLIENTS

1.1. In accordance with the Company's Anti-Money Laundering (AML) and Know Your Client (KYC) policies, the Company is required to identify the Client and verify their true identity using relevant documents and data both at the start of the business relationship and on an ongoing basis throughout the relationship.

1.2. During the registration process, the Client must provide the Company with identification information, which includes the Client's full name, date of birth, country of residence, mobile phone number, and email address.

1.3. After receiving the identification information, the Company will verify the provided details by requesting appropriate supporting documents from the Client.

1.3.1. A valid document verifying the Client's identity must be a high-resolution scanned copy or a clear photo of an official identification document, such as a passport, driving license, or any other national ID.

1.3.2. A valid document verifying the Client's proof of address must be a high-resolution copy or photo of a utility bill, bank statement, or bank reference issued within the last three (3) months that clearly shows the Client's name and address.

1.4. Upon request by the Company, the Client is required to provide a high-resolution scanned copy or photo of both the front and back sides of their credit or debit card. The front side must display the cardholder's full name, the expiry date, and the first six and last four digits of the card number. The back side must show the cardholder's signature, while the CVC2/CVV2 code must be covered for security purposes.

1.5. The Company will regularly monitor the Client's due diligence status and accounts to assess the level of risk they pose and to detect any changes in the information provided by the Client that may affect the business relationship.

1.6. If the Company determines that the business relationship with the Client poses a potentially high risk of money laundering or terrorism financing, the Company reserves the right to request additional data and documentation that may be necessary under the circumstances to further assess and mitigate the risk.

1.7. The Client is obligated to promptly notify the Company of any changes in their personal or contact information to ensure that all records remain accurate and up to date.

## **2. PAYMENT POLICY**

2.1. To minimize the risk of money laundering and terrorism financing, the Company does not accept or disburse cash under any circumstances. All financial transactions must be conducted through approved and traceable payment methods.

2.2. The Company reserves the right to refuse processing a transaction at any stage if it suspects that the transaction is in any way connected with money laundering, criminal activity, or any illegal actions. The Company's decision in such cases is final and aimed at complying with international anti-money laundering (AML) regulations.

2.3. In accordance with international legislation, the Company is legally prohibited from informing the Client if their account has been reported for suspicious activity related to money laundering or terrorism financing. This is to ensure that investigations are not compromised.

2.4. The name of the individual making a deposit must match the Client's name as recorded in the Company's system. The Company does not accept payments from third parties. This ensures that only the rightful account holder can deposit and withdraw funds.

2.5. The Company enforces strict compliance with its established deposit and withdrawal procedures. Funds can only be withdrawn to the same account and using the same method that was used for depositing. The name of the payee for withdrawal requests must also match the Client's name in the Company's records. If a deposit was made via wire transfer, any withdrawal must be sent back to the same bank account using the same wire transfer method. Similarly, if the deposit was made using an online payment system, the withdrawal must be sent back to the same payment system and account.

2.6. To ensure compliance with AML regulations, the Company requires that withdrawals are made in the same currency as the original deposit. This prevents currency manipulation and ensures transparency in financial transactions.

2.7. The Company retains records of all transactions and client activities for a minimum of five (5) years after the termination of the business relationship. These records are securely maintained to meet international legal and regulatory requirements.

### **3. PERSONNEL TRAINING**

3.1. The Company designates an AML Compliance Officer who holds full responsibility for ensuring the Company's adherence to Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) policies. This officer is tasked with establishing and maintaining the Company's AML program, conducting employee training on AML procedures, and receiving, investigating, and maintaining records of internal reports concerning suspicious activity.

3.2. All employees, managers, and directors of the Company undergo a thorough vetting process before commencing employment. This ensures that the Company hires individuals who meet strict standards of integrity and are capable of upholding the Company's compliance obligations.

3.3. Employees who interact with clients or are involved in AML-related tasks such as verification, monitoring, or checking are required to undergo specialized AML training. Each new employee must follow a comprehensive AML training program upon joining the Company. The training covers key areas such as identifying suspicious transactions, as well as the prevention, detection, and reporting of money laundering and terrorism financing activities. Regular refresher training is also provided to ensure that employees stay updated with the latest AML standards and requirements.

3.4. Any violation of the Company's AML policy must be reported immediately to the AML Compliance Officer. However, if the violation involves or implicates the AML Compliance Officer, the employee is required to report the matter directly to the CEO. This ensures that all violations are properly addressed, even in cases where the compliance officer may be involved.

### **4. INTRODUCING CHANGES TO THE AML POLICY**

4.1. The Company reserves the right to review and/or amend the AML Policy at its sole discretion. Clients are encouraged to regularly review the Policy to stay informed of any updates. By continuing to use the Company's website or services after any changes have been introduced, the Client automatically agrees to and accepts the revised terms of the Policy.