

## ANTI-MONEY LAUNDERING PROVISIONS

### INTRODUCTION

UBK Markets Ltd, (hereinafter referred to as ‘the ‘Company’) is an investment firm that operates globally.

UBK Markets Ltd is incorporated in the Republic of Cyprus with Registration Number HE293861. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (‘CySEC’), with license No. 186/12, and operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 2007, Law 144(I)/2007, as subsequently amended from time to time (the Law). The Company’s office is located at 67, Spyrou Kyprianou Avenue, Kyriakides Business Center, 2nd Floor, CY-4003 Limassol.

1. UBK Markets Ltd actively prevents any activity that promotes money laundering. These Provisions require that the Company management and other staff follow specific standards that prevent the use of their products and services for money laundering.
2. Money laundering means actions intended to conceal or mask the criminal origin of the income and exchange for money or other assets that are 'clean'.
3. Anti-money laundering procedures mean that the Company requests that its Customers present respective documents confirming their identity and from where the money credited to the Master Account opened with the Company to purchase specific products and services has come. If the Customer of the Company is a legal entity, then such a Customer shall provide the Company with the documents confirming its legal incorporation under the law of the country where the legal entity is a resident.
4. Fulfilling its obligations under these Provisions, the Company has established the following mandatory rules for all Customers:
  - When crediting funds to the Master Account, the name of the sender shall fully correspond to the name indicated during the registration of “My Account”.
  - Payments from third parties are not allowed.
  - Funds may be withdrawn only through the same payment method they were deposited to the
  - Master Account.
  - When transferring funds from the Customer’s Trading Account or Master Account to banking accounts or to accounts in an electronic payment system, this transaction may not be performed unless the name of the addressee corresponds in full with the name indicated in the registration form for “My Account” in the Company.
5. The Company shall closely monitor suspicious actions and transactions and inform controlling bodies of such actions in a timely manner.
6. In compliance with the Company’s requirements to check a Customer’s identity the Customer shall confirm his/her name, personal data and address with legally valid documents, upon request.
7. When checking a Customer’s identity, the Company compares the photos in the identification documents provided by the Customer.
8. The Company is not authorized to and is not obliged to determine whether the identity document, provided by the Customer, is legal. However, in the case that it is evident that the information obtained does not correspond to that required the Company may require that the

Customer provides additional documents to establish his/her identity. In the event that the Customer refuses to provide the required information, as and when requested, or attempts to mislead Company's employees, the Company may refuse to render services to such a Customer.

9. If the Company finds any signs of suspicious activities that may be related to money laundering, information thereof shall be communicated to the competent bodies.

### **Documents Required for Account Opening**

**Photo ID** - The following documents are acceptable for photo identification:

- A valid passport
- Valid government ID, such as a Driver's License or State ID
- Valid National Identity Card

**Proof of Residence** - The following are acceptable forms of proof of residence:

- All proof of residences must be current and not older than 6 months.

We must be able to understand the language shown on your Photo ID and Proof of Residence. Please provide an English translation of your documents so that we can verify your identity.

### **Bank Account Requirements**

All the Company's account holders **MUST** have a valid bank or credit card account in their name. The bank statement should show their name and the same registered address as their application.

### **Funds Withdrawal Procedures**

The withdrawal process is described below and is structured around strict guidelines to make sure that funds are securely sent back to their originating source and beneficiary.

The Company's Customers must complete a withdrawal request containing their correct account information.

All withdrawal forms are submitted to the Company's accounts department for processing. Our accounts department confirms the account balance, verifies that there are no holds or withdrawal restrictions on the account, and then approves the withdrawal request, pending compliance approval.

Company's accounts department reviews all withdrawal requests, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file.

Our accounts department examines the withdrawal request against the customer's deposit history to make sure there is no suspicious activity, and verifies the bank account on file.

Withdrawal requests approved are processed by the accounts department and the funds are released to the Customer. In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by the Company.

The Company will work with our Compliance department to see if further action needed and if any relevant regulatory bodies need to be contacted.

### **AML Policy Details**

The Company monitors funding from various bank accounts outside of the account holder's home country.

The Company performs its actions on the basis of the anti-money laundering framework set forth by the Financial Markets Authority (FMA).

The Company neither accepts cash deposits nor disburses cash under any circumstances.

The Company does not accept third-party deposits of any kind.

The Company matches each deposit to the account name on file for that Customer.

The Company reserves the right to refuse processing a transaction at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, the Company is not obligated to inform the Customer if suspicious activity is reported to any corresponding regulatory or legal bodies.

### **Account Opening Procedures**

Prior to opening an account, Fidelis shall document the identity, nature of business, income, source of assets if applicable, and investment objectives of each prospective Customer.