

## Anti-Money Laundering Policy

Smart Invest does not tolerate money laundering and supports the fight against money launderers. Smart Invest follows the guidelines set by the UK's Joint Money Laundering Steering Group. The UK is a full member of the Financial Action Task Force (FATF), the intergovernmental body whose purpose is to combat money laundering and terrorist financing. Smart Invest now has policies in place to deter people from laundering money. These policies include: ensuring clients have valid proof of identification maintaining records of identification information determining that clients are not known or suspected terrorists by checking their names against lists of known or suspected terrorists informing clients that the information they provide may be used to verify their identity closely following clients' money transactions Not accepting cash, money orders, third party transactions, exchange houses transfer or Western Union transfers. Money laundering occurs when funds from an illegal/criminal activity are moved through the financial system in such a way as to make it appear that the funds have come from legitimate sources. Money Laundering usually follows three stages: firstly, cash or cash equivalents are placed into the financial system secondly, money is transferred or moved to other accounts (e.g. futures accounts) through a series of financial transactions designed to obscure the origin of the money (e.g. executing trades with little or no financial risk or transferring account balances to other accounts) And finally, the funds are re-introduced into the economy so that the funds appear to have come from legitimate sources (e.g. closing a futures account and transferring the funds to a bank account). Trading accounts are one vehicle that can be used to launder illicit funds or to hide the true owner of the funds. In

particular, a trading account can be used to execute financial transactions that help obscure the origins of the funds. Smart Invest directs funds withdrawals back to the original source of remittance, as a preventative measure. International Anti-Money Laundering requires financial services institutions to be aware of potential money laundering abuses that could occur in a customer account and implement a compliance program to deter, detect and report potential suspicious activity. These guidelines have been implemented to protect Smart Invest and its clients. For questions/comments regarding these guidelines, please contact us at [support@SmartInvest.com](mailto:support@SmartInvest.com)

**What is Money Laundering?** Money laundering is the act of hiding money obtained illegally, so the source appears legitimate. We adhere to strict laws rendering it illegal for us or any of our employees or agents to knowingly engage in or attempt to engage in any activities remotely related to money laundering. Our anti-money laundering policies increase investor protection and client security services, as well as offer safe payment processes.

**Identification** The first safeguard against money laundering is sophisticated Know-Your-Client (KYC) verification. To ensure compliance with standard AML regulations, we require you to submit the following documentation:

- **Proof of Identification:** A clear copy of the front and back of your government-issued photo ID, i.e. a valid passport, driver's license, or national ID card.
- **Proof of Residence:** An official document issued within the last 3 months, clearly stating your name and address as registered with Smart Invest. This can be a utility bill (i.e. water, electric, or landline), or bank statement. Please make sure your copy includes:

- Your full, legal name
- Your full residential address
- Date of issue (within the last 3 months)
- Name of the issuing authority with an official logo or stamp
- Copy of the front

and back of your credit card: To ensure your privacy and security, only the last 4 digits of your credit card must be visible. You can also cover the last 3 digits on the back of your card (CVV code). Please note that regulatory requirements differ in certain countries and we may need to request further documentation from you. Monitoring We do not accept third-party payments. All deposits must be made in your own name and match the KYC documents submitted. Due to AML regulatory policies, all funds withdrawn must be returned to the exact source from which they were received. This means that funds originally deposited via bank transfer will be returned to the same account when a withdrawal request is made. Equally, if you deposited via credit card, your funds will be returned to the same credit card when a withdrawal request is made. We do not, under any circumstances accept cash deposits or disburse cash when requests for withdrawal are made. Reporting AML regulation requires us to monitor and track suspicious transactions and report such activities to the relevant law enforcement agencies. We also reserve the right to deny a transfer at any stage if we believe the transfer to be connected in any manner to criminal activity or money laundering. The law prohibits us from informing customers about reports submitted to law enforcement agencies concerning suspicious activity