

# Anti-Money Laundering Policy

Money laundering involves transforming money or other monetary instruments derived from illegal activities (such as fraud, corruption, terrorism, ETC.) into assets that seem legitimate, obscuring their illicit origins.

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If a client, agent, or employee of MISHOV MARKETS is found to have engaged in money laundering, MISHOV MARKETS will implement all necessary measures to prevent such activities and their potential consequences, in full compliance with both domestic and international laws.

## 1.

### **MISHOV MARKETS Anti-Money Laundering Procedures**

MISHOV MARKETS rigorously adheres to the anti-money laundering and counter-terrorism financing policy (AML/CTF). To support global efforts against money laundering and terrorism financing, all financial organizations must gather, verify, and store account holder identification data. MISHOV MARKETS has developed an advanced electronic system to combat money laundering, which documents and verifies client identification and meticulously tracks all transactions.

**As part of its anti-money laundering program, MISHOV MARKETS implements the following procedures:**

#### **1.1 Client Identification**

To comply with anti-money laundering laws, MISHOV MARKETS requires two forms of identification from customers. The first must be a government-issued ID with the customer's photo, such as a passport, driver's license (if used as primary ID in the country), or a local ID card (excluding company access cards).



The second must be a bill with the customer's name and current address, issued no more than three months prior. This can be a utility bill, bank statement, affidavit, or any similar document from an internationally recognized organization.

For bank card deposits, clients must submit full-size color copies of both sides of their cards within two days. Failure to do so will result in the trading account being blocked, and funds will be returned to the card. The front of the card must show the first six and last four digits of the card number, the holder's name, and the expiration date. The back must be signed with the CVC/CVV code covered. According to VISA and Mastercard rules, the holder's signature must be in the designated field on the back of the card. If the card lacks the holder's name or is a virtual card, a profile screenshot or bank statement showing the card number and holder's name must be provided.

To change the phone number associated with the Client Profile, clients must provide proof of the new number's ownership (e.g. an agreement with a mobile service provider) and a photo of their ID next to their face. The personal data in both documents must match.

Clients are responsible for providing up-to-date identification information and notifying MISHOV MARKETS immediately of any changes.

All documents must be in English or translated into English by an official translator, with the translation stamped and signed, and submitted alongside the original document showing the client's photo.

## **1.2. Tracking and Documentation**

MISHOV MARKETS closely monitors suspicious activities and transactions, promptly reporting them to the appropriate authorities, with legal protections in place for the information providers.

## **1.3. No Cash Settlements**

To minimize the risk of money laundering and terrorism financing, MISHOV MARKETS does not accept or process cash deposits, withdrawals, or any other cash transactions.



## 2. PEP Monitoring

Clients must declare their status as a politically exposed person (PEP) by marking the appropriate field in their Client Profile and providing supporting documents that confirm their status and the origin of their funds. A PEP is defined as someone entrusted with prominent public functions, including:

- a)** Heads of state or government, ministers, and deputy or assistant ministers
- b)** Members of parliament or similar legislative bodies
- c)** Members of the governing bodies of political parties
- d)** Members of supreme courts, constitutional courts, or other high-level judicial bodies
- e)** Members of courts of auditors or central bank boards
- f)** Ambassadors, chargés d'affaires, and high-ranking military officers
- g)** Members of the state-owned enterprises' administrative, management, or supervisory bodies
- h)** Directors, deputy directors, and board members or equivalents
- i)** Mayors

↓ **These functions do not include middle-ranking or junior officials.**

### **Family members include:**

- a)** The spouse or equivalent of a PEP;
- b)** Children and their spouses or equivalents;
- c)** Parents.



## **Close associates are:**

- a)** Individuals with joint beneficial ownership of entities or arrangements with a PEP;
- b)** Individuals with sole beneficial ownership of entities or arrangements benefiting a PEP.

The company must refuse service and return funds if a PEP does not provide documents explaining the origin of their deposit funds. The company will re-verify PEP statuses annually to update the data.

### **3.**

## **Refusal to Process Suspicious Transactions**

MISHOV MARKETS reserves the right to refuse any transaction at any stage if it believes the transaction may be linked to money laundering, fraudulent, or criminal activity. MISHOV MARKETS is not required by international law to inform the client if their activities are reported as suspicious.

### **4.**

## **System Updates**

MISHOV MARKETS regularly updates its electronic system to ensure compliance with current legislation regarding transactions and client identification verification.

### **5.**

## **Data Storage**

Upon closing a client's profile, trading accounts on the website or mobile app, and trading platforms, the following data will be stored for five years:

### **-For Individual Clients:**

- **Personal information:** full name, email address, user ID, confirmed residential address, and phone number.



- **Financial information:** payment details, trading history, and correspondence with the company.
- **Photos and videos:** copies and/or photos of supporting documents.

### **-For Legal Entity Clients:**

- **Registration information:** company name, full corporate details, user ID, phone number, and email address.
- **Financial information:** payment details, trading history, and correspondence with the company.
- **Photos and videos:** copies and/or photos of the company's supporting corporate documents and supporting documents of the individual representing the company.

## **6.**

### **Payment Policy: Deposits and Withdrawals**

Chargebacks to the Skrill payment system and bank cards are prohibited. Withdrawal requests must be submitted through the Client's Profile, and funds will be transferred within three business days. Losses from trading cannot be reimbursed via chargebacks. Please review the risk disclosure before trading in Terms & Conditions.

Deposits must come from the sender whose name matches the customer name in MISHOV MARKETS' records. Third-party payments are not accepted.

Withdrawals must be made to the same account and method used for the deposit, and the recipient's name must match the customer's name in MISHOV MARKETS' records. Wire transfer deposits can only be withdrawn by wire transfer to the same bank account. Electronic currency transfer deposits can only be withdrawn through the same system to the same account.

To comply with AML, CTF procedures, withdrawals must be made in the same currency used for deposits.

For bank card withdrawals, the client's profile (ID, phone number, email, and address) must be fully verified to meet payment processing centers' requirements.



For cryptocurrency withdrawals, the client's profile (ID, phone number, email, and address) must be fully verified to ensure secure payments and protect the client's funds.

We conduct thorough checks using Refinitiv World-Check to ensure dishonest individuals do not access our platform. Refinitiv World-Check is an information service that helps companies comply with anti-money laundering and counter-terrorism financing regulations. This service provides accurate and reliable information to help companies easily make decisions about onboarding new clients and monitoring them in their day-to-day operations. World-Check allows companies to cross-reference the information collected during the KYC (Know Your Customer) process with sanctions lists, law enforcement watchlists, and, in some cases, lists of politically exposed persons (PEPs). This service is trusted by major global companies and helps them comply with anti-money laundering, counter-terrorism financing, and anti-bribery and corruption laws. We review using this database, which includes key sanctions lists and terrorist attack data, ensuring that dishonest individuals do not have access to our platform.

MISHOV MARKETS reserves the right to revise this anti-money laundering program at any time without prior notice. Clients, employees, agents, and related parties must comply with the AML & CTF program's provisions.

For inquiries, please contact us via email:

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Your reviews and feedback are important to us.

[www.mishovmarkets.com](http://www.mishovmarkets.com)