

## AML POLICY

Counter-Terrorism Financing (CTF). To help the government fight the funding of terrorism and money

laundering activities, law requires all financial institutions to obtain, verify, and record information that

identifies each person opening an account

Money laundering – the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments that look legitimate to hide or distort the real source of funds.

The process of money laundering can be divided into three sequential stages:

- **Placement.** At this stage, funds are converted into financial instruments, such as checks, bank

accounts, and money transfers, or can be used for purchasing high-value goods that can be

resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency

exchangers). To avoid suspicion by the company, the launderer may as well make several

deposits instead of depositing the whole sum at once, this form of placement is called smurfing.

- **Layering.** Funds are transferred or moved to other accounts and other financial instruments. It is

performed to disguise the origin and disrupt the indication of the entity that made the multiple

financial transactions. Moving funds around and changing in their form makes it complicated to

trace the money being laundered.

- **Integration.** Funds get back into circulation as legitimate to purchase goods and services.

that aim or facilitate the process of legalizing of illegally gained funds .  
AML policy means  
preventing the use of the company's services by criminals , with the aim of  
money laundering , terrorist  
financing or other criminal activity .  
To prevent money  
circumstances . The company reserves the right to suspend any client's  
operation , which can be regarded as  
illegal or, may be related to money laundering in the opinion of the staff.  
Company Procedures

also performs all the required measures in accordance with applicable law  
and regulations ,  
issued  
by

following :laundering, Copiqat Markets neither accepts nor pays cash under  
anyCopiqat is committed to the highest standards of the Anti- Money Laundering  
(AML) compliance and  
Copiqat adheres to the principles of Anti-Money Laundering and actively prevents  
any actions  
Copiqat will make sure that it is dealing with a real person or legal entity. Copiqat  
Markets  
Copiqat ry authorities. The AML policy is being fulfilled within Copiqat by means  
of the  
● know your customer policy and due diligence  
● monitoring of client activity  
● record keeping

#### Know Your Customer and Due Diligence

Because of the company's commitment to the AML and KYC policies, each client of  
the company has to

finish a verification procedure .

the company ensures that satisfactory evidence is produced or such other measures that will produce

satisfactory evidence of the identity of any customer or counterparty are taken . The company as well applies

heightened scrutiny to clients , who are residents of other countries , identified by credible sources as

countries , having inadequate AML standards or that may represent a high risk for crime and corruption and

to

beneficial owners who reside in and whose funds are sourced from named countries .

Individual clients

During the process of registration, each client provides personal information, specifically: full name; date of

birth; country of origin; and complete residential address. The following documents are required in order to

verify the personal information: A client sends the following documents (in case the documents are written

in non -Latin characters: to avoid any delays in the verification process, it is necessary to provide a notarized

translation of the document in English) because of the requirements of KYC and to confirm the indicated

information:

- Current valid passport (showing the first page of the local or international passport, where the

- photo and the signature are clearly visible); or

- Driving licence which bears a photograph; or

- National identity card (showing both front and back pages);

- Documents proving current permanent address (such as utility bills, bank statements, etc.)

containing the client's full name and place of residence. These documents should not be older

than 3 months from the date of filing.

Corporate clients

In case the applicant company is listed on a recognised or approved stock exchange or when there is

independent evidence to show that the applicant is a wholly owned subsidiary or a subsidiary under the control of such a company, no further steps to verify identity will normally be required. In case the company is unquoted and none of the principal directors or shareholders already has an account with

Before CopiqatMarkets starts any cooperation with the client, Copiqat, the following documentations must be provided:

- Certificate of Incorporation or any national equivalent;
- Memorandum and Articles of Association and statutory statement or any national equivalent;
- Certificate of good standing or other proof of registered address of the company;
- Resolution of the board of directors to open an account and confer authority on those who will operate it;
- Copies of powers of attorney or other authorities given by the directors in relation to the company;
- Customer (according to the Individual identity verification rules described above );
- Proof of identity of the beneficial owner(s) and/or the person(s) on whose instructions the signatories on the account are empowered to act (according to the Individual identity verification rules described above).

Monitoring of client activity

of every client to identify and prevent any suspicious transactions . A suspicious transaction is known as a transaction that is inconsistent with the client's legitimate business or the usual client's transaction history

named transactions (both automatic and, if needed , manual ) to prevent using the company 's services by criminals .

#### Record keeping

Records must be kept of all transaction data and data obtained for the purpose of identification , as well as of all documents related to money laundering topics (e.g. files on suspicious activity reports , documentation of AML account monitoring , etc.). Those records are kept for a minimum of 7 years after the account is closed .

#### Deposit and withdrawal requirements

requirements :

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Proof of identity of directors in case he/she will deal with Copiqat on behalf of the Due to AML / CTF laws, Copiqat cannot receive or deposit funds to third parties. Details Funds sent to Copiqat must be provided on Copiqat platform only. In addition to gathering information from the clients, Copiqat continues to monitor the activity

known from client activity monitoring. Copiqat has implemented the system of monitoring the

All deposits and withdrawals on trading accounts held with Copiqat the following strict

- All funds withdrawn from a trading account must go to a bank account, Credit/Debit card or



All withdrawal requests are processed on a First-in-First-Out (FIFO) basis according to the funding source of origination. For example, a deposit is made via Debit /Credit Card; then a subsequent withdrawal request is received. The amount of funds sent back to the relevant Debit /Credit Card, when a withdrawal request is received, may not exceed the original amount deposited. Any profits made in excess of the deposited amount will be transferred to a nominated bank account; which must be held in the same name as your trading account.

Measures taken

In

cases

of

an

attempt

to

execute

transactions

related  
to  
money  
laundering  
or  
other  
criminal  
activity ,  
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will  
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and  
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money  
laundering

has  
complete  
discretion  
to  
temporarily  
block  
the  
suspicious  
client  
account  
or  
terminate  
an  
existing  
client  
relationship .



which Copiqat suspect are  
in the opinion of the staff. CopiqatAlternative Payment Method (Crypto) on  
Copiqat platform.

Copiqat reserves the right to suspend any client' s operation, which can be  
regarded as illegal or