

Anti-money Laundering

FXRIVER Ltd supports the fight for the prevention and suppression of the use of the financial system for the purpose of money laundering and terrorist financing. FXRIVER follows the guidelines set by the Unit for Combating Money Laundering.

FXRIVER Ltd has put in place systems and procedures according to the provision of the Law and the directive (with the purpose to make sure that its business is not used for the purposes of money laundering or terrorist financing) in relation to the following:

- (a) customer identification and customer due diligence;
- (b) record-keeping of customer information;
- (c) internal reporting of suspicious transactions to the internal anti-money laundering compliance officer;
- (d) internal control, risk assessment and risk management in order to prevent money laundering and terrorist financing;
- (e) detailed examination of each transaction which by its nature may be considered to be particularly vulnerable to be associated with money laundering offences or terrorist financing and in particular complex or unusually large transactions and all other unusual patterns of transactions which have no apparent economic or visible lawful purpose;
- (f) informing our employees in relation to the Law and the internal policies and anti-money laundering procedures of FXRIVER LTD;
- (g) ongoing training of our employees in the recognition and handling of transactions and activities which may be related to money laundering or terrorist financing.

In the context of the above measures, FXRIVER LTD is not to be required (and may be unable under Applicable Regulations) to accept a person as its Client until all documentation it requires has been received by FXRIVER LTD, properly and fully completed by such person and all internal

FXRIVER Ltd checks (including without limitation all anti-money laundering customer identification and due diligence checks) have been duly satisfied.

It is further understood that FXRIVER LTD reserves the right to impose additional due diligence requirements to accept Clients residing in certain countries where the risk of money laundering may be higher.

During the customer identification and due diligence checks FXRIVER LTD shall apply processes to verify your identity for which (amongst other things) Photo identification information will be required from you. In certain circumstances we may require this information to be authenticated by an appropriate third party.

FXRIVER LTD requires Government issued Photo identity documents such as a passport, driving license and/or identity card containing your full name, personal photo, and date of birth, ID number and expiry date as well as evidence of your residential address, such as a utility bill or bank statement, for the verification process. The information in these documents should agree with the details submitted in your application.

In addition, FXRIVER LTD does not accept cash, money orders, third party transactions, exchange houses transfer or Western Union transfers or similar. FXRIVER reserves the right to reject any deposits from accounts not belonging to the client or effect any withdrawals to third parties.

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. FXRIVER direct 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 FXRIVER LTD and its clients.

For questions /comments regarding these guidelines, contact FXRIVER

Compliance at compliance@fxriver.com

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