



MONAXA

**ANTI-MONEY
LAUNDERING AND
COUNTER-TERRORISM
FINANCING POLICY**

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ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORISM FINANCING (CTF) POLICY

Monaxa Ltd [A000001175] (“the Company”, “Monaxa”, “we”, “our” or “us”) is registered in Anguilla, British West Indies.

The company provides online platforms for customers to trade over-the-counter (OTC) derivatives, including margin foreign exchange (“Forex”) contracts and contracts-for-difference (“CFDs”). The company’s online platforms operate through the www.monaxa.com website (“Website”) and the Monaxa mobile applications (the “Apps”).

1. GENERAL DEFINITION

Money laundering is the act of converting money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human trafficking, etc.) into money or investments that appear to be legitimate. Such activity is used so that the illegal source of money and other material values cannot be traced.

Terrorism financing, on the other hand, refers to the act of providing funds or financial support to individuals, groups, or organizations that engage in terrorist activities. This includes the collection, transfer, or use of funds, whether from legal or illegal sources, with the intent to support acts of terrorism or terrorist organizations.

Monaxa is vigilant in ensuring the prevention of its involvement or misuse in money laundering or terrorism financing activities. The Company does not knowingly accept assets or enter into business relationships where there is reasonable cause to believe that such assets may have been acquired illegally, represent the proceeds of criminal activity, or are intended to support terrorist activities.

2. POLICY STATEMENT AND PRINCIPLES

Monaxa is committed to maintaining the highest standards of compliance with Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) legislative requirements. This policy incorporates best practices from international standards, including FATF recommendations, and local regulatory requirements to prevent the misuse of the Company’s services for money laundering or terrorist financing purposes.

The Company has adopted a programme that complies with the AML & CTF legislative requirements. This policy applies to all The Company officers, employees, appointed producers and products and services from The Company.

All business units and locations within the Company will cooperate to create a cohesive effort in the fight against money laundering and counter-terrosism financing activities. Each business unit and location has implemented risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the International Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) legislative requirements.

All efforts exerted will be documented and retained in accordance with the Anti-Money Laundering and Counter-Terrorism Financing regulations of the jurisdiction the Company operates under. The MLRO is responsible for initiating Suspicious Activity Reports ("SARs") or other required reporting to the appropriate law enforcement or regulatory agencies. Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the MLRO.

It is the policy of the Company to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. The Company is committed to AML & CTF compliance in accordance with applicable law and requires its officers, employees and appointed producers to adhere to these standards in preventing the use of its products and services for money laundering purposes.

3. CUSTOMER INFORMATION VERIFICATION

The Company determines the identity of the beneficial ownership of all its customers' accounts and does not open or maintain such accounts, unless it is satisfied of this requirement, as stipulated in the AML & CTF legislative requirements. It has established procedures to obtain appropriate evidence of customer identity and maintains adequate records of customer identity and transactions involved in such a manner as to assist, if necessary, in the investigation of criminal offences.

In accordance with the AML & CTF legislative requirements, the Company establishes the identity and verify the identity of any customer of the Company by requiring the customer to produce an identification record or such other reliable, independent source document.

For verification purposes, the Company shall rely on a government-issued identification to establish a customer's identity. The Company, however, will analyse the information provided to determine if there are any logical inconsistencies in the information obtained.

The Company will document its verification, including all identifying information provided by the customer, the methods used and results of the verification.

If a customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, the compliance officers shall notify the MLRO. The Company will thereafter decline the application.

For individual customers, the Company requires the following identification and verification measures:

- Obtaining and verifying the customer's full name, residential address, and date of birth.
- Requiring government-issued identification documents such as a passport, national ID, or driver's license.
- Ensuring that the identification document is valid and matches the customer's provided information.

For corporate customers, the Company implements the following measures to verify identity and beneficial ownership:

- Obtaining the company's legal name, registration number, and head office address.

- Verifying the company's legal form and ownership structure, including the identities of directors and principal owners.
- Identifying and verifying the beneficial owners of the company and ensuring that any person acting on behalf of the company is authorized to do so.
- Collecting and reviewing relevant documents such as the certificate of incorporation, memorandum and articles of association, and board resolutions.

4. PREVENTION OF THIRD PARTY FUNDING, TRANSFER, WITHDRAWAL AND SHELL BANKS OPERATIONS

The Company strictly does not allow third party funding. Any funds coming to the account must come from the same account holder.

The Company strictly does not allow transfer of trading funds between different trading accounts belonging to different account holders.

The Company strictly implements the policy in which withdrawals must be performed only through the same bank account, credit/debit card or digital wallets that customers used to deposit the funds. All customer withdrawal requests shall be processed in the currency in which the deposit was originally made.

The Company strictly prohibits operations with accounts/relationships with shell banks.

5. MONITORING AND REPORTING SUSPICIOUS ACTIVITY

The Company collects and verifies identification data of the customer and also logs and tracks itemised statements of all transactions carried out by the customer.

The Company employs a risk-based approach to monitor transactions and identify unusual or suspicious activities. Transactions that deviate from the customer's known profile or expected behavior may be subject to further review. Suspicious transactions will be reported to the appropriate regulatory or law enforcement authorities in accordance with applicable laws.

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

In addition, any wire deposit of USD 100,000 and above may be subjected to approval prior to acceptance of funds. The customer may be required to complete an ECDD (Enhance Customer Due Diligence) procedure. If approval is not given, funds may be rejected and returned, and applicable charges are borne by the customer.

The Company reserves the right to refuse to process a transaction at any stage, when 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 that they were reported to the corresponding governing bodies due to the customer's suspicious activity.

6. RECORD-KEEPING

The Company maintains comprehensive records of customer identification, verification processes, and transaction logs. These records are retained for a minimum of five years and are made available to regulatory authorities upon request.

7. TRAINING AND AWARENESS

The Company provides regular training to employees on AML & CFT policies, procedures, and regulatory requirements. This ensures that all staff are equipped to identify and report suspicious activities effectively.

8. SANCTION SCREENING

The Company shall implement a robust sanction screening process in compliance with law of Anguilla to ensure that no transactions or business relationships involve individuals, entities, or countries subject to sanctions. This process will include:

- Screening all customers, beneficial owners, and transactions against relevant sanctions lists, including those issued by the OFAC, United Nations, and other applicable authorities.
- Conducting ongoing monitoring to identify any changes in the sanction status of existing customers or transactions.
- Ensuring that no funds or services are provided to individuals or entities listed on sanctions lists or operating in jurisdictions subject to sanctions.
- Documenting and retaining records of all sanction screening activities, including any identified matches and actions taken.

The Company will immediately report any confirmed matches to the appropriate regulatory or law enforcement authorities.

9. RESTRICTED COUNTRIES

While we welcome customers from all over the globe, governmental restrictions along with our company policies prohibit The Company from opening accounts originated from the following restricted and/or OFAC sanctioned countries, as well as high risk and non-cooperative jurisdictions: Australia, Belgium, Cyprus, France, Indonesia, Spain & United States of America.

10. INDEPENDENT AUDIT

The Company shall conduct regular independent audits of its AML/CFT policies, procedures, and controls to ensure their effectiveness and compliance with applicable laws and regulations. These audits will:

- Be performed by qualified and independent auditors with expertise in AML/CFT compliance.
- Assess the adequacy of the Company's risk-based approach, customer due diligence measures, transaction monitoring systems, and reporting mechanisms.
- Identify any gaps or weaknesses in the implementation of the AML/CFT framework and recommend corrective actions.

- Be documented, with findings and recommendations reported to senior management and the Board of Directors.

The results of these audits will be used to enhance the Company's AML/CFT program and ensure continuous improvement in compliance standards.

Should you require any further information and/or have any questions about this document please direct your request and/or questions to support@monaxa.com.

