An#-money laundering Policy

Alfa Capitals has policies in place to deter people from laundering money. These policies include:

- 1. Ensuring clients have valid proof of iden:fica:on maintaining records of iden:fica:on informa:on;
- 2. Determining that clients are not known or suspected terrorists by checking their names against lists of known or suspected terrorists;
- 3. Informing clients that the informa:on they provide may be used to verify their iden:ty;
- 4. Closely following clients' money transac:ons. Not accep:ng cash, money orders, third party transac:ons, exchange houses transfer or Western Union transfers.

What is Money Laundering?

Money laundering is the act of hiding money obtained illegally, so the source appears legi:mate. We adhere to strict laws rendering it illegal for us or any of our employees or agents to knowingly engage in or aMempt to engage in any ac:vi:es remotely related to money laundering. Our an:-money laundering policies increase investor protec:on and client security services, as well as offer safe payment processes.

Money Laundering usually follows three stages:

- 1. Firstly, cash or cash equivalents are placed into the financial system;
- 2. Secondly, money is transferred or moved to other accounts (e.g. futures accounts) through a series of financial transac:ons designed to obscure the origin of the money (e.g. execu:ng trades with liMle or no financial risk or transferring account balances to other accounts);
- 3. And finally, the funds are re-introduced into the economy so that the funds appear to have come from legi:mate 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 par:cular, a trading account can be used to execute financial transac:ons that help obscure the origins of the funds. We directs funds withdrawals back to the original source of remiMance, as a preventa:ve measure.

Interna:onal An:-Money Laundering requires financial services ins:tu:ons to be aware of poten:al money laundering abuses that could occur in a customer account and implement a compliance program to deter, detect and report poten:al suspicious ac:vity.

These guidelines have been implemented to protect our clients.

What is an#-money laundering policy?

An:-money laundering (AML) is a term mainly used in the financial and legal industries to describe the legal controls that require financial ins:tu:ons and other regulated en::es to prevent, detect, and report money laundering ac:vi:es.

We treats money laundering as an illegal ac:vity and stands at the forefront of figh:ng against any criminal ac:vity. We always keep in touch with responsible industry authori:es and keep a track of what goes down around, especially when it comes to our account holders.

Iden#fica#on

The first safeguard against money laundering is sophis:cated Know-Your-Client (KYC) verifica:on. To ensure compliance with standard AML regula:ons, we require the customer to submit the following documenta:on:

- 1. Proof of Iden:fica:on: a clear copy of the front and back of the government-issued ID, i.e. a valid passport or driver's license.
- 2. Proof of Residence: an official document issued within the last 3 months, clearly sta:ng the name and address. This can be a u:lity bill (i.e. water, electric, or landline), or bank statement.
- 3. Copy of the front and back of the bank card used for the transac:on: to ensure the privacy and security, only the last 4 digits of the card must be visible. The client can also cover the CVV code.
- 4. The Declara: on of Deposit.

Please note that regulatory requirements differ in certain countries and we may need to request addi:onal documenta:on.

Monitoring

We do not accept third-party payments. All deposits must be made in your own name and match the KYC documents submiMed. 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 withdrawal requests are made.

Repor#ng

AML regula:on requires us to monitor and track suspicious transac:ons and report such ac:vi:es to the relevant law enforcement agencies. We also reserve the right to deny a transfer at any stage if we believe the transfer may be connected in any manner to criminal ac:vity or money laundering. The law prohibits us from informing customers about reports submiMed to law enforcement agencies concerning suspicious ac:vity.

Please contact us with any ques:ons, comments or for clarifica:on.