

# Money Laundering Prevention Policy

Company Name

TTCM Traders Trust Capital Markets Ltd

Review Date

14/02/2025

Version

2025-01

## **1. INTRODUCTION**

1.1. **TTCM Traders Trust Capital Markets Ltd** is a limited liability company.

1.2. The Company is obligated to comply with various legislation, including The Proceeds of Crime Act 1997 (as amended), the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Regulations 2008, the Anti-Terrorism (Financial and Other Measures) Act 2004 (as amended), the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing Supervision and Enforcement) Act 2008 (as amended), and the Financial Intelligence Agency Act 2007 (as amended). Collectively, these regulations form the core legal framework for Bermuda's anti-money laundering (AML) and anti-terrorist financing (ATF) efforts.

1.3. Preventing money laundering is a vital responsibility for financial institutions worldwide. Money laundering facilitates the movement of illicit funds derived from criminal activities, disguising their origin and making them appear legitimate. This not only destabilizes financial systems but also supports illegal activities, such as terrorism financing. To mitigate these risks, companies must adopt robust Anti-Money Laundering (AML) strategies to detect, prevent, and report suspicious activities. By doing so, they contribute to the protection of the global financial system, safeguard their reputation, and comply with regulations designed to fight crime and terrorism.

## **2. COMPANY APPROACH TO PREVENTING MONEY LAUNDERING**

2.1. The Company is fully dedicated to preventing money laundering through its services and adheres to the following regulatory requirements:

- a. Verifying the identity of Clients;
- b. Monitoring, identifying, and reporting any suspicious transactions;
- c. Retaining transaction records for at least five (5) years following the end of the contractual relationship with Clients;
- d. Training staff to recognize and report suspicious transactions;
- e. Reporting any suspicious activities to the relevant authorities.

2.2. The Company maintains the right to request and verify identification from its Clients before account activation or processing payments.

2.3. Clients should assume that all information provided to the Company may be shared with relevant regulatory authorities in the following jurisdictions: (a) the Company's country of incorporation, (b) the country of origin of funds transferred to the Company, and (c) the country to which funds are refunded or withdrawn.

2.4. The Company reserves the right to decline any fund transfer if it suspects a link to criminal activities or money laundering.

2.5. The Company is legally required to report all suspicious transactions and is prohibited from notifying Clients if their activities are under investigation. Misuse of accounts may result in criminal prosecution.

2.6. The Company does not wish to engage with any Client whose funds originate from illegal activities or whose transactions are deemed unlawful in any way.

2.7. The Company reserves the right to amend or revise its Money Laundering Prevention Policy at any time, at its sole discretion, as deemed necessary or appropriate.

2.8. In line with anti-money laundering regulations and transparency commitments, the Company does not accept third-party payments under any circumstances. Only account holders are permitted to make deposits to fully compliant accounts, and third parties are not allowed to deposit on behalf of account holders under any condition.

2.9. The Money Laundering Prevention Policy is intended to provide insight into the Company's procedures for combating money laundering. This policy is not part of the Company's Terms and Conditions and does not impose any additional obligations beyond those outlined in the regulatory framework referenced in section 1.2.

2.10. If you have any questions regarding the Money Laundering Prevention Policy, please contact our Compliance Department at: [contact@ttcm-capital.com](mailto:contact@ttcm-capital.com).