

MONEY LAUNDERING PREVENTION POLICY

Policy Details:

- **Initial Issuance:** December 2018
- **Approved By:** Board of Directors
- **Managed By:** TTCM Traders Trust Capital Markets Ltd
- **Point of Contact:** Chief Executive Officer
- **Scope:** Applicable to all employees and clients
- **Last Updated:** December 2020
- **Scheduled Review:** December 2022
- **Current Version:** 2
- **Available Translations:** Not available

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MONEY LAUNDERING PREVENTION POLICY

1.1 Company Information

The company is officially registered with the Registrar of Companies under Company Number 250591 and maintains its registered office 3 Thalias Str., 3rd Floor, Offices 310-318, 3011 Limassol, Cyprus.

1.2 Regulatory Compliance

The Company operates in strict adherence to the applicable laws and regulations governing its activities.

1.3 Legal Framework for AML & ATF Compliance

As part of its regulatory obligations, the Company complies with Bermuda's anti-money laundering (AML) and anti-terrorist financing (ATF) framework, which includes:

- The **Proceeds of Crime Act 1997 (as amended)** (the "Act")
- The **Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Regulations 2008** (the "Regulations")
- The **Anti-Terrorism (Financial and Other Measures) Act 2004 (as amended)** (the "ATF Act")
- The **Proceeds of Crime (AML & ATF Supervision and Enforcement) Act 2008 (as amended)** (the "SE Act")
- The **Financial Intelligence Agency Act 2007 (as amended)** (the "FIA Act")

Collectively, these regulations form the cornerstone of Bermuda's AML and ATF framework.

1.4 Commitment to Preventing Financial Crimes

Preventing money laundering and the financing of terrorism is a fundamental responsibility of financial regulatory authorities worldwide. Money laundering enables the movement of illicit funds, concealing their criminal origins and potentially financing unlawful activities, including terrorism. The Company is committed to maintaining robust policies and procedures to detect, prevent, and report any suspicious financial activities.

2. MONEY LAUNDERING PREVENTION OBLIGATIONS

2.1 Commitment to Compliance

The Company is dedicated to preventing any form of money laundering through its services. To ensure full compliance with regulatory requirements, we adhere to the following measures:

- a. Verifying the identity of all clients before account activation.
- b. Monitoring, identifying, and reporting any transactions that appear suspicious.
- c. Retaining transaction records for at least five (5) years after the termination of a client relationship.
- d. Training employees to detect and report suspicious financial activities.
- e. Reporting suspicious transactions to relevant authorities in various jurisdictions, depending on client location.

2.2 Client Identity Verification

Prior to opening an account or processing any financial transactions, the Company reserves the right to request and verify proof of identity from all clients. Clients can refer to the identity verification requirements outlined in our 'Account Opening Form(s)'.

2.3 Information Disclosure to Authorities

Clients should assume that any information provided to the Company may be made available to competent regulatory authorities in:

- (a) The Company's country of incorporation, i.e., the Republic of Cyprus.
- (b) The country of origin of funds deposited into the Company's accounts.
- (c) The destination country of any funds withdrawn or refunded by the Company.

2.4 Transaction Monitoring and Rejection Rights

The Company retains the right to decline or halt any fund transfers if there is reason to believe that the transaction is linked to illicit activities, including money laundering.

2.5 Reporting of Suspicious Transactions

The Company is legally obligated to report any suspicious transactions to the relevant authorities. Clients will not be notified if their accounts have been flagged or reported for suspicious activity. Any misuse of accounts may result in legal action, including criminal prosecution.

2.6 Strict Policy on Illicit Funds

The Company does not accept business from individuals whose funds originate from illegal activities. Any transaction that raises concerns about legality will be subject to review, and appropriate action will be taken.

2.7 Policy Updates and Amendments

The Company reserves the right to modify or update its Money Laundering Prevention Policy at any time to ensure continued compliance with evolving regulatory standards.

2.8 Prohibition of Third-Party Payments

For transparency and regulatory compliance, the Company strictly prohibits third-party payments. Deposits may only be made by the account holder, and no third party is allowed to transact on behalf of a client under any circumstances.

2.9 Nature of the Policy

This Money Laundering Prevention Policy serves as an internal guideline and does not form part of the Company's Terms and Conditions of Business. It does not impose any obligations beyond those required under the **Anti-Money Laundering and Counter-Terrorism Financing Act No. 13 of 2014**, as amended.

2.10 Contact Information

For any questions regarding this policy, please contact our Compliance Department:

 **Email:** contact@ttcm-capital.com