

# ANTI-MONEY LAUNDERING POLICY

**Version: May 2024**

## **1. AML Policy**

1.1. JustforexGO (hereinafter referred to as the “Company” and/or “we” and/or “our” and/or “us”), like the majority of companies providing services on the financial market, adheres to principles of Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalization of illegally gained funds. AML policy means preventing the use of the Company's services by criminals, with the aim of money laundering, terrorist financing or other criminal activity.

1.2. For this purpose, strict policy on the detection, prevention and warning the corresponding bodies of any suspicious activities was introduced by the Company. Moreover, the Company has no right to report Clients that the law enforcement bodies are informed on their activity. Complex electronic system for identifying every Company's Client and conducting a detailed history of all operations was introduced as well.

1.3. To prevent money laundering, we neither accept nor pay cash under any circumstances. We reserve the right to suspend any Client's operation, that can be regarded as illegal or, may be related to money laundering in the opinion of staff.

## **2. Company's Procedures**

2.1. The Company will make sure that it is dealing with a real person or legal entity. AML policy is being fulfilled within the Company by means of the following:

- Know Your Customer Policy and Due Diligence
- Monitoring of Client activity
- Record Keeping

## **3. Know Your Customer and Due Diligence**

3.1. Due to the Company's commitment to the AML and KYC policies, each Client of the Company has to finish the verification procedure. Before the Company starts any cooperation with the Client, the Company must ensure that satisfactory evidence is produced or such other measures are taken as will produce satisfactory evidence of the identity of any Client or counterparty. The Company as well applies heightened scrutiny to Clients, who are residents of the countries, identified by credible sources as countries, having inadequate AML standards or may represent high risk for crime and corruption and to beneficial owners who reside in and whose funds are sourced from named countries.

## **4. Individual Clients**

4.1. During the process of registration, each Client provides personal information, specifically: full name, date and place of birth, residential address, phone number and city code, other information the Company deems necessary. In order to meet the Company's requirements for KYC

and identity verification and to confirm the indicated information. Clients who are natural persons should provide the following information upon the Company's request:

- A high-resolution copy of the government-issued identification document, which should contain: full name, date of birth, photo and citizenship, and also, where applicable: confirmation of the document validity (issue and/or expiry date), holder's signature. Such identification document might be a passport, national ID, driver's license or similar document. The indicated documents must be valid at the time of submission and for at least 30 days from the submission date. The company reserves the right to request a second form of the identification document.
- A high-resolution copy of a receipt of utility services payment (gas, water, electricity or other) or bank statement, or other document (for example, ID card, Tax Clearance, Residence Permit) containing full client's name and the actual place of residence. These documents should be not older than 6 months from the date of submission.

4.2. When accepting new Clients during the verification process and documents review The Company reserves the right to apply other requirements and procedures for the Client's identification. Such procedures are to be determined at the Company's sole discretion and subject to variations depending on the country of residence of the Client and can include but not limited to:

- the requirement to verify the bank card used to deposit/withdraw funds;
- the requirement to provide a source of funds, source of wealth and proof of funds being deposited in a form and manner as the Company finds appropriate.

## **5. Corporate Clients**

5.1. In case the applicant company is listed on a recognised or approved stock exchange or where there is independent evidence to show that the applicant is a wholly owned subsidiary or subsidiary under the control of such a company, no further steps to verify identity will normally be required. In case the company is unquoted and none of the principal directors or shareholders already has an account with the Company, the official provides the following documents because of the requirements of KYC:

- A high-resolution copy of the certificate of incorporation/certificate of registration.
- Extract from Commercial Register, or equivalent document, evidencing the registration of corporate acts and amendments.
- KYC documents of all officers, directors and beneficial owners of the corporate entity.
- A high-resolution copy of Memorandum and Articles of Association or equivalent documents duly recorded with the competent registry.
- Evidence of the company's registered address; and the list of shareholders and directors.
- Description and nature of business (including date of commencement of business, products or services provided, location of principal business).
- This procedure is performed to establish the identity of the Client and to help the Company know/understand Clients and their financial dealings to be able to provide the best services of online trading.

## **6. Monitoring of Client Activity**

6.1. In addition to gathering information from the Clients, the Company continues to monitor the activity of every Client to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is inconsistent with the Client's legitimate business or usual Client's transaction history known from the Client activity monitoring. The Company has implemented the system of monitoring the named transactions (both automatic and manual) to prevent the use of the Company's services by criminals.

## **7. Deposit and Withdrawal Requirements**

7.1. All the Clients' operations to deposit and withdraw funds have the following requirements:

- in case of bank transfer or transfer from the bank card, name, indicated during the registration must match the name of the owner of the account/bank card. It is possible to withdraw funds from the account via bank transfer only in the same bank and the same account which you used for depositing;
- in case of using electronic payment systems, withdraw funds from the trading account is possible only on the system and the account used for depositing;
- if the account was credited in the way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account of the client or any other way may be used, as agreed with the Company with the condition that the Company is able to prove the identity of the account owner;
- if the account has been credited with funds through various payment methods, funds withdrawal shall be made on a pro rata basis commensurate to the size of each deposit. Any profit gained can be transferred to any account from which the deposits arrived as long as such transfer is possible;
- if the account has been credited using various payment methods and one of such methods was a bank card(s), the Company shall only process withdrawal requests to such a bank card(s) until up to the total amount of initial deposit using the bank card(s) is withdrawn before allowing to create any withdrawal requests via other payment methods and withdrawal of profit gained;
- no deposits and withdrawals to the bank accounts, bank cards, electronic money, or any other kind of payment accounts of third parties are allowed.