



AML POLICY 2021



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1. Introduction

"Money laundering" is the practice of engaging in a series of financial transactions to conceal the ownership, source, control or destination of illegally gained money. Ultimately, it is the process by which the proceeds of crime are made to appear to have a legitimate origin. Infratrader Limited is committed to preventing money laundering through its service and complies.

Infratrader is committed to the highest standards of the Anti-Money Laundering (AML) compliance and Anti-Terrorist Financing and requires the management, and employees to follow the named standards.

Money laundering – the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments that look legitimate to hide or distort the real source of funds.

The process of money laundering can be divided into three sequential stages:

- Placement** - At this stage funds are converted into financial instruments, such as checks, bank accounts, and money transfers, or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make several deposits instead of depositing the whole sum at once, this form of placement is called smurfing.
- Layering** - Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace the money being laundered.
- Integration** - Funds get back into circulation as legitimate to purchase goods and services.

Implemented Procedures

Infratrader aims at implementing strict anti-laundering policy to ensure that its customers will be identified for such suspicion up to a certain standard to minimize the procedural complications for genuine and legitimate customers. In order to fulfil its commitment to provide full assistance to government combating against such illegal financial transactions, Infratrader has developed technologically advanced and reliable electronic system which verifies its client identification and is able to store the detailed record of all previous financial transactions.

Deposit and Withdrawal Requirements

The Company reserves the right to suspend or refuse to process a transaction at any stage, where 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 obliged to inform the Client that it has reported to the corresponding bodies of the Client's suspicious activity.

Monitoring of client activity and patterns

Infratrader is also committed to regularly update its electronic system for inspection of suspicious transactions and for verification of client identification records, in accordance with any new regulations as they are promulgated, as well as providing training for its employees on enhancements to anti-money laundering procedures that may be required

Withdrawals Additional Disclosure

Withdrawal recipient name must match the name of account holder who is withdrawing money. If money is withdrawn via online payment system, it can be done only to the same account/e-wallet from where it was deposited.