

# AML Policy

Tradomart SV Ltd.

August 2018

Proprietary Restriction:

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## Legal Information

Tradomart SV Ltd. is a company incorporated under the Laws of Saint Vincent and the Grenadines with Registration Number 23071 IBC 2015 having its head office at Shamrock Lodge, Murray Road, Kingston St. Vincent & the Grenadines and rendering the investment and ancillary Services (hereinafter the “Company”) to its Clients through the Trading Platform.

### Policy

Tradomart SV Ltd. collects and verifies the personal identification information of all account holders, and then subsequently logs and tracks the transactions that are carried out by its clients. In order to open an account with Tradomart SV. Ltd., a valid form of government-issued identification (Passport, State ID, or Driver's License), a proof of residence, and bank account information is required, along with a completed account application. It should be noted that tracks any suspicious transactions made by Client and any transactions executed under non-standard trading conditions.

- Tradomart SV Ltd. carries out its activities in line with the anti-money laundering framework as laid out by the [Financial Action Task Force](#);
- All Tradomart SV Ltd. Client funds are held in separate, segregated accounts that are designated solely for Client deposits and withdrawals;
- Tradomart SV Ltd. monitors funding from bank accounts held outside the account holder's home country;
- Tradomart SV Ltd. does not accept deposits from third-parties nor cash deposits or disbursements under any circumstances;
- Tradomart SV Ltd. matches each deposit to the account name held on file for that Client;
- Tradomart SV Ltd. reserves the right to refuse to process a transaction where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, is under no obligation to inform the Client when suspicious activity is reported to any corresponding regulatory or legal bodies.

## **Account Opening Procedures - Know Your Customer Policy (KYC)**

As a part of the account opening procedure, Prospective Clients must provide proof of identity and address, source of funds and investment objectives to Tradomart SV Ltd.

The “Financial Action Task Force” (FATF) sets AML policies for countries to follow. Tradomart SV Ltd. is required to do an “Enhanced Due Diligence” on Clients from countries which do not fully meet the FATF standards and does not provide services to clients from *The United States, North Korea, Iran, Myanmar, Cuba, Sudan and Syria*.

## **Account Opening Requirements**

Tradomart SV Ltd. is committed to the prevention of money laundering activities through our services and as such comply with regulatory requirements such as:

- Identifying the Company Client;
- Identifying, monitoring and reporting any kind of suspicious transactions;
- Maintaining transaction records for minimum 5 years after the termination of our contractual relationships with our Clients;
- Training our staff to recognize suspicious transactions and to fulfil all reporting obligations;
- Depending on the Client’s location, report any suspicious activities to authorities in several countries.

**Photo ID** - The following are acceptable forms of photo identification:

- A valid passport;
- A valid National Identity Card;
- A valid government ID, such as a Driver's Licence or State ID.

*(Please note that all photo IDs are verified through third-party compliance software).*

**Proof of Residence** - The following are acceptable forms of proof of residence:

- A utility or phone bill;
- A bank statement.

*(Please note that proof of residence must be current i.e. not older than 180 days).*

## **Bank Account Requirements**

Tradomart SV Ltd. account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

## **Funds Withdrawal Procedure**

The withdrawal procedure at detailed below follows the strict principle that ensures funds are securely remitted back to their originating source.

- Tradomart SV Ltd. Client must complete a signed paper or digital withdrawal request containing inter alia, their correct account information;
- The withdrawal form must be submitted to Tradomart SV Ltd. Finance department for processing. The Finance department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and then approve the withdrawal request, pending compliance approval;
- The Tradomart SV Ltd. Compliance department reviews all withdrawal requests approved by the Finance department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file;
- The Compliance department will also examine the withdrawal request against the Client's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file;
- Withdrawal requests approved by the Tradomart SV Ltd. Compliance department are sent back to the Finance department, and the funds are released to the Client;
- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by Tradomart SV Ltd. management;
- Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

### **Compliance Footnote**

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by Tradomart SV Ltd. Compliance department. A detailed copy of Tradomart SV Ltd. compliance policy is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning policies, please contact Tradomart SV. Ltd. Compliance department [compliance@forexmart.com](mailto:compliance@forexmart.com) No substitutions or modifications will be accepted to the requirements above. The Compliance department reserves the final determination regarding the validity of these documents.

### **General Notice**

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company; (b) the country of origin of any funds transmitted to; and (c) the destination country of any funds refunded by or withdrawn from the Company.

We do not wish to do business with those whose funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever. The Company reserves the right to review and/or amend its Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.