**Financial Markets Trading Company Limited**

**Anti Money Laundering Policy**

**(Web Version 1.0)**

# Introduction

Financial Markets Trading Company Limited (or “The Company” or “FMTC”) Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) is designed to prevent and mitigate possible risks of FMTC being involved in any kind of illegal activity. **This document is a short extract of key principles from the Company's Internal Policy and should not be viewed as a full AML/KYC Policy.**

# General Requirements for the Company

Under the regulations, the company has five main responsibilities in the area of AML compliance:

* Appoint an Anti-Money Laundering Compliance Officer (AMLCO);
* Thoroughly check the identities of all new clients;
* Simplify as much as reasonably possible for employees the process of reporting suspicious transactions;
* Take and maintain complete records of clients’ identities and transaction histories;
* Educate and remind employees about the requirements in this booklet and how to raise suspicion.

# Specific Requirements for the Company

Before the company can execute any transaction for any new client, a number of procedures need to be in place and carried out.

* AML procedures, namely identification, record-keeping, discovering and monitoring unusual or suspicious transactions and as appropriate internal reporting and control;
* Employees know their responsibilities and the company’s procedures;
* Relevant training is being undertaken;
* All relevant requests from outside sources are forwarded directly to the AMLCO.

The company shall apply appropriate measures and procedures, by adopting a risk-based approach, so as to focus its effort in those areas where the risk of Money Laundering and Terrorist Financing appears to be comparatively higher.

Whenever the company receives supporting documents related to a new client’s identity, it needs to be completely satisfied that they demonstrate the existence of the new client as a real natural or legal person and that they are indeed whom they say they are. Although the company will at times rely on third party sources as part of its fact-checking procedure when onboarding clients, the company bears ultimate legal responsibility for the checks being satisfactory.

Where the identification submitted is incomplete, inaccurate or otherwise insufficient, the company cannot proceed with opening an account for the client submitting such identification. Indeed, in more serious cases where money laundering, identity fraud or other crimes are suspected as opposed to simple carelessness or misunderstanding, the AMLCO would inform the Labuan FSA.

As part of the company’s policy of due diligence, five main pieces of information need to be collected and actions conducted:

* Establish the source of the applicant’s funds
* Discover the applicant’s net worth
* Find out the particular source of the funds to be deposited
* Where applicable, source references or any other appropriate documents that attest to the applicant’s good reputation
* Conduct thorough background checks

Clear scans of documents sent by email or through the company’s CRM are normally acceptable. Sometimes though the company might need to see certified copies or originals. Documents could be certified by a notary public or other similar authority, an appropriate public sector official or an authorised financial institution. Copies of documents can also be certified by employees of the company if they are made in employees’ presence.

If any document relevant to a corporate entity (such as extract from a register of commerce) is available online through a relevant official website, the company may refer to the online version of the document on condition that a printout is made by an employee of the company and stored in the appropriate client’s file.

In addition to these documents, clients need to provide their phone numbers and email addresses.

Responsibility for verifying applicants’ identities rests with the AMLCO. Verification must be complete with sufficient evidence before any customer agreement can be sent to an applicant.

Any employee who suspects money laundering needs to report it. Beyond this, though, if reasonable grounds are deemed to exist for suspicion of the same, an employee would be committing an offence by not suspecting and reporting.

# Reporting to Labuan FSA

Any suspicion of a client or an activity that is sustained will be reported to the Labuan IBFC and Labuan FSA. This would normally be by means of a forwarded internal report. If the regulator then requires more details, the company would make certain that all relevant information is sent to the Labuan FSA without delay.