



ANTI-MONEY LAUNDERING POLICY

COMPANY REGISTRATION: HE 349061
Licensed & Regulated by **CySEC**, License Number **312/16**

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Risk Warning: Please note that trading in forex and other leveraged products may involve a significant level of risk and is not suitable for all investors. Before undertaking any such transactions, you should ensure that you fully understand the risks involved and seek independent advice if necessary.

Legal: ROYAL FINANCIAL TRADING (CY) LTD is authorized and regulated by CySEC (License no.312/16)

INTRODUCTION

Royal Financial Trading (CY) Ltd (hereinafter “the Company”), is registered under Cyprus Company Law with registration number HE349061. The Company is authorized and regulated as a Cyprus Investment Firm (CIF) by the Cyprus Securities and Exchange Commission (CySEC), License Number 312/16, under the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017) (“the Law”), as amended from time to time, and subject to CySEC Laws and Regulations. The Company’s head office is located at Level 3 IRIS House, 8 John Kennedy, 3106 Limassol, Cyprus.

The Company is operating under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (the “Markets in Financial Instruments Directive 2014/65/EU” or “MiFID II”) and amending Directive 2002/92/EC and Directive 2011/61/EU, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016 and under Regulation (EU) No 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (the “MiFIR”) which was implemented in Cyprus by the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), which provide for the provision of Investment Services, the exercise of Investment Activities, the operation of Regulated Markets and other related matters (the “Investment Services and Activities and Regulated Markets Law”), as the same may be modified and amended from time to time.

The Company collects and verifies the personal identification information of all account holders, and subsequently logs and tracks the transactions that are carried out by its clients. In order to open an account with the Company, a valid form of government-issued identification (Passport, National 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 the Company tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.

- The Company carries out its activities in line with the anti-money laundering framework as laid out by the Financial Action Task Force.
- All client funds are held in segregated accounts that are designated solely for each individual client for deposit and withdrawal purposes.
- The Company monitors funding from bank accounts held outside the account holder's home country.
- The Company does not accept deposits nor disbursements to third parties under any circumstances.
- The Company matches each deposit to the account name held on file for that client.
- The Company reserves the right to refuse to process any transaction which it believes to be connected, in any way, to money laundering or criminal activity. In accordance with international law, the Company 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 CLIENT POLICY (KYC)

As part of the account opening procedure, prospective clients must provide proof of identity and address, source of funds and investment objectives to the Company.

The “Financial Action Task Force” (FATF) sets AML policies for countries to follow. The Company is required to do an “Enhanced Due Diligence” on clients from certain countries as they are classified as High Risk by the FATF; thus, we cannot accept clients from the United States, North Korea, Iran, Myanmar, Cuba, Sudan, Syria, British Colombia, Iraq and Japan.

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ACCOUNT OPENING REQUIREMENTS

The Company is committed to the prevention of money laundering activities through our services and, as such, comply with regulatory requirements such as:

- Identifying our clients;
- Identifying, monitoring and reporting any kind of suspicious transactions;
- Maintaining transaction records for a minimum of five (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 client 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 License 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. no older than 90 days)

BANK ACCOUNT REQUIREMENTS

• Royal 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 Royal, detailed below, follows the strict principle that ensures funds are securely remitted back to their originating source.

- Royal clients must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.
- The withdrawal form must be submitted to Royal 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
- Royal 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 Royal 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 Royal management.
- Royal Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

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COMPLIANCE FOOTNOTE

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by Royal Compliance department. A detailed copy of our compliance policy is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning Royal's policies, please contact our Compliance department. No substitutions or modifications will be accepted to the requirements above. Royal Compliance department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to Royal is available to the competent regulatory authorities in

- (a) the country of incorporation of Royal, i.e. the Republic of Cyprus;
- (b) the country of origin of any funds transmitted to Royal; and
- (c) the destination country of any funds refunded by or withdrawn from Royal.

Royal does not allow the provision of investment and ancillary services in case the funds of the clients are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

Royal reserves the right to review and/or amend its Anti-Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding.