

## Vtr Trade Ltd AML Policy

### **ANTI-MONEY LAUNDERING (AML) POLICY**

#### **DEFINITION**

Money laundering is the act of converting money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human traffic etc.) into money or investments that appear to be legitimate. Such activity is used so that the illegal source of money and other material values cannot be traced.

#### **POLICY STATEMENT AND PRINCIPLES**

Vtr Trade Ltd (hereinafter called the “Company”) is an entity incorporated in Saint Vincent and The Grenadines with the following registrations: Company Number 26510 BC 2021. The Company complies with all applicable laws and regulations in Saint Vincent and The Grenadines.

The Company has adopted a programme that complies with the AML/CTF Act. This policy applies to all The Company officers, employees, appointed producers and products and services from The Company.

All business units and locations within The Company will cooperate to create a cohesive effort in the fight against money laundering. Each business unit and location has implemented risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the International Anti Money Laundering Law.

All efforts exerted will be documented and retained in accordance with the Anti-Money Laundering law. The AML Compliance Committee is responsible for initiating Suspicious Activity Reports (“SARs”) or other required reporting to the appropriate law enforcement or regulatory agencies. Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the AML Compliance Committee.

#### **POLICY**

It is the policy of The Company to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. The Company is committed to AML compliance in accordance with applicable law and requires its officers, employees and appointed producers to adhere to these standards in preventing the use of its products and services for money laundering purposes.

## **CUSTOMER INFORMATION VERIFICATION**

In verifying customer identity, appointed compliance officers shall review photo identification. The Company shall not attempt to determine whether the document that the customer has provided for identification has been validly issued.

For verification purposes, The Company shall rely on a government-issued identification to establish a customer's identity. The Company, however, will analyse the information provided to determine if there are any logical inconsistencies in the information obtained. The Company will document its verification, including all identifying information provided by the customer, the methods used and results of the verification, including but not limited to sign-off by the appointed producer of matching photo identification.

If a customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, the appointed agent shall notify the chief compliance manager. The Company will thereafter decline the application.

## **PREVENTION OF THIRD-PARTY FUNDING, TRANSFER & WITHDRAWAL**

The Company strictly does not allow third party funding. Any funds coming to the account must come from the same account holder. The Company strictly does not allow transfer of trading funds between different trading accounts belonging to different account holders. This is to prevent the possibility of money laundering. The Company strictly implements the policy in which withdrawals must be performed only through the same bank account, credit/debit card or digital wallets that clients used to deposit the funds. All client withdrawal requests shall be processed in the currency in which the deposit was originally made.

## **MONITORING AND REPORTING SUSPICIOUS ACTIVITY**

The Company collects and verifies identification data of the Client and also logs and tracks itemised statements of all transactions carried out by the Client.

If the Company tracks suspicious transactions of the clients and transactions executed under nonstandard conditions. The Company performs its anti-money laundering compliance based on AML/FATF recommendations.

The Company neither accepts cash deposits nor disburses cash under any circumstances. The Company reserves the right to refuse to process a transaction at any stage, when 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 obligated to inform the client that they were reported to the corresponding governing bodies due to the client's suspicious activity.



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## **RESTRICTED COUNTRIES**

The Company does not service US entities or residents of any kind. While we welcome clients from all over the globe, governmental restrictions along with our company policies prohibit The Company from opening accounts originated from the following restricted and/or OFAC sanctioned countries, as well as high risk and non-cooperative jurisdictions: Afghanistan, Bosnia and Herzegovina, Democratic People's Republic of Korea (DPRK), Guyana, Iran, Iraq, Lao People's Democratic Republic, Myanmar, Papua New Guinea, Syria, Uganda, Vanuatu, Yemen.

## **RELEVANT DEPARTMENT**

- 8.1. Customer Service Department Email: support@vtrtrade.com
- 8.2. Finance Department Email: finance@vtrtrade.com