

MONEY LAUNDERING PREVENTION POLICY

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| Owner(s): | TTCM TRADERS CAPITAL LIMITED |
| Contact Person: | Chief Executive Officer |
| Operational Applicability: | All personnel & Clients |
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MONEY LAUNDERING PREVENTION POLICY

- 1.1. **TTCM Traders Capital Limited**, a limited liability Company, incorporated in Bermuda under section 14 and 6/132C(1) of the Companies Act 1981, registered with the Registrar of Companies under Company number 54135 and with registered address 5th Floor, Andrew's Place, 51 Church Street Hamilton HM 12 Bermuda.
- 1.2. The Company is operating in accordance with the above mentioned Laws.
- 1.3. As such, the Company is required to comply with The Proceeds of Crime Act 1997 (as amended) (the "Act"), the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Regulations 2008 (the "Regulations"), the Anti-Terrorism (Financial and Other Measures) Act 2004 (as amended) (the "ATF Act"), the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing Supervision and Enforcement) Act 2008 (as amended) (the "SE Act") and the Financial Intelligence Agency Act 2007 (as amended) (the "FIA Act") (together referred to as the "Legislation") comprise the central framework for Bermuda's anti-money laundering ("AML") and anti-terrorist financing ("ATF") regime.
- 1.4. Preventing money laundering is a major responsibility and aim of regulatory authorities worldwide. Money laundering allows movement of funds from criminal activities and makes funds available for terrorist activities.

2. THE COMPANY'S MONEY LAUNDERING PREVENTION OBLIGATIONS

- 2.1. At the Company, we are committed to preventing any money laundering activities through our services and as such comply with regulatory requirements such as:
- a. Identifying our Clients;
 - b. Identifying, monitoring and reporting any kind of suspicious transactions;
 - c. Maintaining transaction records for a minimum of five (5) years after the termination of our contractual relationships with our Clients;
 - d. Training our staff to recognize suspicious transactions and to fulfil all reporting obligations;
 - e. Depending on Client location, report any suspicious activities to authorities in several countries.
- 2.2. The Company reserves the right to collect and validate proof of identification from its Clients prior to account opening and any payments of proceeds. In order to verify our identification requirements, please consult the statements on our '**Account Opening Form(s)**'.
- 2.3. 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, *i.e.* the Republic of Cyprus; (b) the country of origin of any funds transmitted to the Company; and (c) the destination country of any funds refunded by or withdrawn from the Company.
- 2.4. The Company reserves the right to refuse to process a transfer of funds at any stage if it believes it to be connected in any way to criminal activities or money laundering.
- 2.5. The Company is obliged to report all suspicious transactions and is prohibited from informing Clients in case they have been reported for suspicious account activity. Account misuse may result in criminal prosecution.
- 2.6. The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.
- 2.7. 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.
- 2.8. The Company does not accept third party payments under any conditions in accordance with the commitment to anti money laundering provisions and regulatory transparency. Only account holders may deposit to fully compliant client accounts and no third party will be permitted to deposit on behalf of the account holders under any conditions.
- 2.9. Our Money Laundering Prevention Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding or impose or seek to impose any obligations on

us which we would not otherwise have, but for *Anti-Money Laundering And Counter-Terrorism Financing Act No. 13 of 2014*, as the same may be in force from time to time and modified or amended from time to time.

- 2.10. Should you have a question about our Money Laundering Prevention Policy please direct your questions to our Compliance Department: compliance@traders-trust.com.