KYC & AML POLICY

RaiseFx is committed to the highest standards of the Anti-Money Laundering (AML) compliance and Counter-Terrorism Financing (CTF).

To help the governments fight the funding of terrorism and money laundering activities, law requires all financial institutions to obtain, verify, and record information that identifies each person opening an account.

Definitions

RaiseFx uses the following definitions :

- Money laundering – the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments that look legitimate to hide or distort the real source of funds.

The process of money laundering can be divided into three sequential stages:

- Placement. At this stage, funds are converted into financial instruments, such as checks, bank accounts, and money transfers, or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make several deposits instead of depositing the whole sum at once, this form of placement is called smurfing.
- Layering. Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace the money being laundered.
- Integration. Funds get back into circulation as legitimate to purchase goods and services.

RaiseFx adheres to the principles of Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalizing of illegally gained funds. AML policy means preventing the use of the company's services by criminals, with the aim of money laundering, terrorist financing or other criminal activity.

To prevent money laundering, RaiseFx neither accepts nor pays cash under any circumstances. The company reserves the right to suspend any client's operation, which can be regarded as illegal or, may be related to money laundering in the opinion of the staff.

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Company Procedures

RaiseFx will make sure that it is dealing with a real person or legal entity.

RaiseFx will also perform all the required measures in accordance with applicable law and regulations, issued by monetary authorities. The AML policy is being fulfilled within RaiseFx by means of the following:

- Know your customer policy and due diligence
- Monitoring of client activity
- Record keeping

Know Your Customer and Due Diligence

Because of the company's commitment to the AML and KYC policies, each client of the company has to comply with a verification procedure.

Before RaiseFx can have full cooperation with the client, the company ensures that satisfactory evidence is produced or such other measures that will produce satisfactory evidence of the identity of any customer or counterparty are taken.

The company as well applies heightened scrutiny to clients, who are residents of sensitive countries, having inadequate AML standards or that may represent a high risk for crime and corruption and to beneficial owners who reside in and whose funds are sourced from named countries.

Individual clients

To get the full privileges of working with RaiseFx, each client provides personal information, specifically: full name; date of birth; country of origin; and complete residential address.

For this purpose, the client must send the following documents (in case the documents are written in non-Latin characters: to avoid any delays in the verification process, it is necessary to provide a notarized translation of the document in English) because of the requirements of KYC and to confirm the indicated information:
- Current valid passport (showing the first page of the local or international passport, where the photo and the signature are clearly visible); or Driving license which bears a photograph; or National identity card (showing both front and back pages);

- Documents proving current permanent address (such as utility bills, bank statements, etc.) containing the client's full name and place of residence. These documents should not be older than 3 months from the date of filing.

Corporate clients

In case the applicant company is listed on a recognised or approved stock exchange or when there is independent evidence to show that the applicant is a wholly owned subsidiary or a subsidiary under the control of such a company, no further steps to verify identity will normally be required.

In case the company is unquoted and none of the principal directors or shareholders already has an account with RaiseFx, the following documentations must be provided:
- Certificate of Incorporation or any national equivalent;
- Memorandum and Articles of Association and statutory statement or any national equivalent;
- Certificate of good standing or other proof of registered address of the company;
- Resolution of the board of directors to open an account and confer authority on those who will operate it;
- Copies of powers of attorney or other authorities given by the directors in relation to the company;
- Proof of identity of directors in case he/she will deal with Vantage on behalf of the Customer (according to the Individual identity verification rules described above);
- Proof of identity of the beneficial owner(s) and/or the person(s) on whose instructions the signatories on the account are empowered to act (according to the Individual identity verification rules described above).

Monitoring of client activity

In addition to gathering information from the clients, RaiseFx continues to monitor the activity of every client to identify and prevent any suspicious transactions.

A suspicious transaction is known as a transaction that is inconsistent with the client's legitimate business or the usual client's transaction history known from client activity monitoring. RaiseFx has implemented the system of monitoring the named transactions (both automatic and, if needed, manual) to prevent using the company's services by criminals.

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Record keeping

Records must be kept of all transaction data and data obtained for the purpose of identification, as well as of all documents related to money laundering topics (e.g. files on suspicious activity reports, documentation of AML account monitoring, etc.). Those records are kept for a minimum of 5 years after the account is closed.

Deposit and withdrawal requirements

All deposits and withdrawals on trading accounts held with RaiseFx the following strict requirements:

Due to AML laws and standards, RaiseFx cannot receive or deposit funds to third parties.

Funds sent to RaiseFx must be from a bank account, Credit/Debit card or Alternative Payment Method under the same name as the trading account name with RaiseFx.

All funds withdrawn from a trading account must go to a bank account, Credit/Debit card or Alternative Payment Method under the same name as the trading account name with RaiseFx.

All withdrawal requests are processed on First-in-First-Out (FIFO) basis according to the funding source of origination. For example, a deposit is made via Debit/Credit Card; then a subsequent withdrawal request is received. The amount of funds sent back to the relevant Debit/Credit Card, when a withdrawal request is received, may not exceed the original amount deposited. Any profits made in excess of the deposited amount will be transferred to a nominated bank account; which must be held in the same name as the trading account.

For example, a customer deposits $100 via Credit Card and earns a profit of $1,000. Requesting a withdrawal of $1,000, he will get $100 to his Credit Card and the rest $900 to his bank account.

All initial withdrawal requests must be verified for safety and security by provision of a bank statement; which includes account holder information and bank details. RaiseFx will not accept deposits or withdrawals made under a different name than the registered RaiseFx account.

If a trading account was credited in a way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account under the same name as the trading account

name with RaiseFx as long as the client provides satisfactory evidence of the ownership of bank account where the funds originated from as well as the destination bank account.

Measures taken

In cases of an attempt to execute transactions which RaiseFx suspects are related to money laundering or other criminal activity, it will proceed in accordance with the applicable law and report suspicious activity to the regulating authority.