

# Anti Money Laundering Policy

## Overview

Anti-Money Laundering (AML) is a term mainly used in the financial and legal industries to describe the legal controls that require financial institutions and other regulated entities to prevent, detect and report money laundering activities. Under the International Money Laundering Abatement and Anti-Terrorist Financing Act, money laundering is explained as the act of converting money or other material values gained from illegal activities such as terrorism, drug dealing, illegal arms trade, corruption, human traffic and etc. into money or investments that appear to be legitimate. Revollet International Limited vows to comply with the above regulation with full attention and no compromise with any of the above illegal activities. For that purpose, Revollet International Limited hereby sets out its Anti Money Laundering Policy.

## Scope of Policy

This policy applies to all Revollet International Limited its officers, employees, introducing brokers, affiliated companies, and products and services offered by Revollet International Limited. Each business unit within Revollet International Limited will cooperate to create a cohesive effort in the fight against money laundering. Each business unit shall implement risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the international laws. All efforts exerted will be documented and retained in accordance with such international laws. The Money Laundering Reporting Officer or Compliance Officer is responsible for initiating Suspicious Activity Reports or other required reporting to the appropriate law enforcement or regulatory agencies.

## Our Commitment

It is the policy of Revollet International Limited to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorists. We are committed to AML compliance in accordance with applicable law and require our officers, employees, introducing brokers and affiliated companies to adhere to these standards in preventing the use of our products and services for money laundering purposes.

## Three Stages

he virtual funds available via your demo platform allow you to familiarize yourself with our trading platforms, and any gains or losses incurred while trading in a demo environment are not suggestive of results you may achieve when trading on a live platform.

## Use of the Site

Generally, money laundering occurs in three stages until the unlawful proceeds appear to have been derived from legitimate origins or constitute legitimate assets. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or travelers checks, or deposited into accounts at financial institutions. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses.

## **Client Identification Procedures**

We shall take reasonable steps to identify who our "client" is by obtaining sufficient evidence of their identity, including, where our contact is acting on behalf of another, the identity of both parties, and establish and verify the identity of the ultimate natural person, namely who owns or controls the customer or its assets, or on whose behalf the transaction is carried out. The followings are some operative examples of the sufficient evidence of their identity and our action plans we take Prior to open of any new trading account, we shall document the identity, residential detail, nature of business and investment purpose by collecting valid passport, driving license or other government issued documents, and utility bill or bank statement as address proof. We shall not accept cash deposit and pay out cash under any circumstances. We shall not accept funds if the name of the originating clients does not match the name of the client in our system. In case of withdrawal, money only can be withdrawn from the same account and the same method which it was received and where the name of the recipient is present, the name must strictly match the name of the client in our system. Third party withdrawal is strictly prohibited. Where an employee of Revollet International Limited knows or suspects or has reasonable grounds for knowing or suspecting that a customer is engaged in or about to engage in money laundering or criminal activity, we reserve the right to refuse to process a transfer at any stage, then that employee must make a Suspicious Transaction Report to Revollet International Limited Money Laundering Reporting Officer in the prescribed format. Although it is hard to give definitive examples of suspicious transactions, the following transactions may be suspicious The trade has no commercial purpose. Funds are paid to Revollet International Limited from an account and settlement instructions are to pay to another account. The settlement instructions are changed at the last minute.

## **Failure to Provide Information**

We have the right to decline the account opening application and report to our Money Laundering Reporting Officer in the following circumstances If you fail to provide us with any documents we request from you either for client identification purpose or for any other reason. If we suspect or has concern that the submitted documents may be false or fake. If we suspect you are involved in illegal or fraudulent activity.

## **Monitoring**

We shall monitor customer transactions and identify and report suspicious activities to regulatory agencies through our Money Laundering Reporting Officer.

## **Training and awareness**

All employees must complete training on the firm's anti-money laundering procedures and obligations as and when required by the Compliance Officer or the MLRO. The MLRO will attend external courses from time to time to ensure that his/her training and awareness are current.

## **Annual Report by MLRO**

Each year, the MLRO reports to the Directors of the Firm to assess Revollet International Limited compliance with the money laundering requirements. This report is produced by the MLRO and Compliance Officer and is considered by the Directors, who are responsible for any necessary action to remedy deficiencies identified by the report.

## **Record Keeping**

Under the Anti-Money Laundering Rules, Revollet International Limited must retain records concerning client identification and transactions for use as evidence in any investigation into money laundering and criminal activity. Client identification records must be kept for at least 5 years after the relationship with the client has ended. Transaction records must be kept for at least 5 years from the date of the relevant transaction

## **Our Compliance Framework**

We have implemented a compliance framework in the Revollet International Limited, as the relevant laws require from financial companies, including appointment of a Compliance Officer, Money Laundering Reporting Officer, preparations of policies and procedures, periodic review of their effectiveness, and providing training for all of our employees on enhancement to anti-money laundering procedures.