

## **Anti-Money Laundering Policy**

Money laundering is defined as moving money in various transactions in order to hide its source, its destination and who the original owner is. It involves conducting financial transactions with the use of illegal money and (or) making an illegal transaction appear legitimate.

All of the trading transactions of the Company shall be free from any form of money laundering. The Company operates with integrity and is committed to implementing the measures established. The Client's failure to comply with the regulations set by the Company would mean termination of his/her account. If the Client is proven of committing money laundering, he/she will be held responsible for any damage or loss which may occur and the Company will be excluded from his/her fraudulent actions.

In an effort to counter money laundering and other illegal activity, the Company has decided not to support any cash transactions, regardless of their stated purpose. The Firm has the right to cancel or deny a transaction at any point if there are suspicions regarding its legality.

### **General Measures**

This AML Policy sets out general measures which will apply to all clients such as:

- checking the identity of the Client
- monitoring any suspicious clients' activities and(or) transactions
- having a record of all the related information and(or) documents of the Client's financial transactions

### **Depositing and Withdrawing**

When depositing money, the sender's name and the present information of the Client should match.

Money transfers from another person or third party are strictly prohibited. Furthermore, we will refuse any third party checks that have not been verified by a managing officer.

In case there is any discrepancy on a transaction, we reserve the right to automatically cancel or suspend the transaction. Further to this, third parties are forbidden to conduct transactions in replace of the Client.

Likewise, the information about the withdrawal's recipient name and the account holder has to be the same. Withdrawal through the online payment system is ONLY allowed on the same account and(or) wallet from where it was deposited.

**These guidelines have been implemented to protect Midmar Capital and its clients.**