



ANTI-MONEY LAUNDERING/ KYC/CFT POLICY

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A2TRADE LLC and A2TRADE OÜ (“we” or “our”) has developed an Anti-Money Laundering and counter terrorism financing Policy (“AML/CTF Program”) for our digital virtual currencies exchange, available at <https://A2TRADEFX.com> (herein and after “A2TRADE”), in an effort to maintain the highest possible compliance with applicable laws and regulations relating to anti-money laundering in Estonian and the European Union and other countries where we conduct business.

This includes, but is not limited to:

Establishing robust internal policies, procedures and controls that combat any attempted use of A2TRADE for illegal or illicit purposes and that are designed to ensure our customers basic protections under consumer protection laws; Maintaining comprehensive records of orders and other transfers; Executing Know Your Customer (“KYC”) procedures on all customers;

Performing regular, independent audits of our AML/CTF Program; Following record retention requirements; Implementing a formal and ongoing compliance training program for all new and existing employees.

POLICIES AND PROCEDURES

Our AML/CTF Program has been reviewed and approved by our Board of Managers (the “Board”). Our AML/CTF Program is regularly reviewed and, if necessary, revised in an effort to comply with applicable rules, regulations and policies.

INTERNAL CONTROLS

We have developed robust internal policies, procedures, and controls designed to comply with applicable AML/CTF laws and regulations, as well as other reporting requirements.

TRAINING

All of our employees and officers receive ongoing broad-based AML/CTF training, as well as position-specific training. They must repeat this training at least once every twelve (12) months to ensure they are knowledgeable and in compliance with all pertinent laws and regulations. New employees receive training within thirty (30) days of their start date. All documentation related to compliance training including materials, tests, results, attendance and date are maintained. In addition, our compliance training program is updated as necessary to reflect current laws and regulations.

CLIENT DOCUMENTS CHECKLIST

Accepted types of documents:

ID: National ID, International Passport, Driving License

-ID must be laminated with Name and Picture and must not be expired.

Proof of Residence: Utility Bill (not mobile) , Bank or Broker statement, bank letter or office government letters.

-Document must be less than three months old

Requirements	Level 1	Level 2	Level 3
Email	✓	✓	✓
Full Name	✓	✓	✓
Date of Birth	✓	✓	✓
Mobile Number	✓	✓	✓
Country	✓	✓	✓
Address	✓	✓	✓
Valid ID	✓	✓	✓
Proof of Residence		✓	✓
Source of Funds			✓

CORPORATE DOCUMENTS CHECKLIST

Please provide all these documents for opening a corporate account for A2TRADE and its services.

Requirements	Corporate
Corporate Email	✓
Full Name Of Director	✓
Date of Birth Of Director	✓
Corporate Phone Number	✓
Proof Of Address	✓
Certificate of Incorporation	✓
Register of Directors and Shareholders	✓
Articles of Incorporation	✓
ID of Director	✓
Source of Funds	✓

VERIFICATION LEVELS

The following chart shows the verification level access for the platform features.

Features	Level 1	Level 2	Level 3	Corporate
Crypto-to-Crypto Trading	✓	✓	✓	✓
Crypto Deposits	✓	✓	✓	✓
Crypto-to-fiat Trading	✓	✓	✓	✓
Crypto Withdrawals	✓	✓	✓	✓
Wire Fiat Deposits		✓	✓	✓
Wire Fiat Withdrawals		✓	✓	✓
CFD and Stock trading		✓	✓	✓
PSP Deposits		✓	✓	✓
PSP Withdrawals		✓	✓	✓
OTC Exchange			✓	✓

SYSTEMS

A2TRADE has contracts with Identity mind and sum and substance to provide automated KYC and AML and PEP checks. IdentityMind and Sum and Substance both offer next-gen anti-money laundering solutions and identity verification solutions that allow you to find trusted digital identities quickly and easily while adhering to AML compliance.

Once the documents are obtained and reviewed, they will be scanned against international databases for additional KYC and anti-money laundering (AML) checks and then reviewed by internal staff. All individual users will be processed to verify identify and check for blacklisted individuals using online AML checks from Sum and Substance and Identity Mind, a KYC and AML API provider. Sum and Substance's automated database is used to verify the identity of clients and the authenticity of a document almost instantly and can determine age, national origin, and other industry-critical parameters for citizens of over 180 countries.

- Conforms to KYC, AML, and GDPR directives for compliance
- Checks use a database including International PEP and Sanctions lists, Country Specific Sanctions lists, Criminal Lists, Securities Lists, and major financial lists
- Supports web and mobile applications
- Determines whether a user or document is genuine with the help of Liveness Detection
- Enables verification of crowd investors, based on Proof of Residence, Utility Bills, and more

The primary system that we will use is Identity mind. If this system is not available and as a secondary check we can manually upload KYC to Sum and Substance.

Sum and Substance <https://sumsub.com/>

Identity Mind <https://identitymindglobal.com/>

COMPLIANCE

Our compliance team is responsible for developing and enforcing the policies and procedures of our AML/CTF Program.

CUSTOMER IDENTIFICATION

The KYC process is an important part of our AML/CTF Program and helps us detect suspicious activity in a timely manner and prevent fraud.

ACCOUNT OPENING PROCESS

In order to open an account and use A2TRADE, your identity must be verified, authenticated, and checked against governmental watchlists. Failure to complete any of these steps will result in your inability to use our services. Automated KYC and AML is built into the traders room, A2TRADE staff will manually review results before access to services is granted.

Individual customer — Prior to opening an account for an individual customer, we attempt to collect, verify, and authenticate the following information:

Email address; Mobile phone number; Full legal name; Date of birth (“DOB”); Proof of identity (e.g., driver’s license, passport); Home address (not a mailing address or P.O. Box); Additional information or documentation at the discretion of our Compliance Team, such as utility bills or bank account statements. If you successfully meet and complete our KYC requirements and do not appear on any government watch-list, then we will provide you with account opening agreements electronically.

Corporate customer — Prior to opening an account for an corporate customer, we attempt to collect, verify, and authenticate the following information:

Company’s legal name; Registered company number; Full legal name (of all account signatories and beneficial owners); Email address (of all account signatories); Mobile phone number (of all account signatories);

Address (principal place of business and/or other physical location); Proof of legal existence (e.g., state certified articles of incorporation or certificate of formation, unexpired government-issued business license, trust instrument or other comparable legal documents as applicable); Contract information of owners, principals, and executive management (as applicable); Proof of identity (e.g., driver’s license, passport or government-issued ID) for each individual beneficial owner that owns 25% or more, as well as all account signatories; Identifying information for each entity beneficial owner that owns 25% or more (see individual customer information collected above for more details). If your institution successfully meets and completes our KYC requirements and neither it nor any of its owners, principals, executive, or managers appear any governmental watchlist, we will provide you with account opening agreements electronically.

SUSPICIOUS ACTIVITY / CURRENCY TRANSACTION REPORTS

We may freeze or suspend your account, as well as report to applicable authorities, if we know, suspect or have reason to suspect suspicious activities have occurred on A2TRADE. A suspicious transaction is often one that is inconsistent with a customer’s known and legitimate business, personal activities or personal means. We leverage our compliance department, which performs transaction monitoring to help identify unusual patterns of customer activity. Our compliance team reviews and investigates suspicious activity to determine if sufficient information has been collected to justify any action from our side.

RECORDS KEEPING

All records are retained for five (5) years and are readily available upon official request by an applicable examiner, regulator, or law enforcement agency.

RISK LOW	RISK MODERATE	RISK HIGH
The risk level is normal, there are no high-risk characteristics present.	<ol style="list-style-type: none"> 1. The place of residence or employment or business of a Client is in a country, which is included in the list of risk countries. 2. The legal person registered in the European Economic Area or in Switzerland, whose area of activity is associated with enhanced money-laundering risk. 3. The legal person is situated in a country, which is listed in the list of risk countries. 4. The legal person is a non-profit association, trust, civil law partnership or another contractual legal arrangement, whose activities and liability are insufficiently regulated by law, and the legality of financing of which is not easy to screen. 	<ol style="list-style-type: none"> 1. The Client is suspected to be or to have been linked with a financial offense or other suspicious activities. 2. The Client is a non-resident individual, whose place of residence or activities is in a country. 3. The Client is a local PEP or a person, associated with a PEP. 4. The representative or the Beneficial Owner / Shareholders of a legal person is a PEP or his or her family member 5. There is information that legal person is suspected to be or to have been linked with a financial offense or other suspicious activities. 6. A legal person registered outside the European Economic Area, whose field of business is associated with a high risk of Money Laundering, or
NORMAL DUE DILIGENCE	ENHANCED DUE DILIGENCE	ESCALATED DUE DILIGENCE
<ol style="list-style-type: none"> 1. A company listed on a regulated market that is subject to disclosure requirements consistent with European Union law; 2. A legal person governed by public law founded in Estonia; 3. A governmental authority or another authority performing public functions in Estonia or a contracting state of the European Economic Area; 4. An authority of the EU 5. A credit institution or a financial institution, acting on behalf of itself, located in a contracting state of the European Economic Area or in a third country (see Exhibit 1). which in the country of location is subject to equal requirements and the performance of which is subject to state supervision. 	<ol style="list-style-type: none"> 1. Upon establishing a new Business Relationship; 2. In the event of insufficiency or suspected incorrectness of the documents or information gathered previously in the course of carrying out DD measures; 3. Upon suspicion of Money 4. In case of companies that have nominee shareholders or shares in bearer form. 5. When suspicion arises regarding truthfulness of the provided data and/or of authenticity of the identification documents regarding the Client or its Beneficial Owners. 	<p>The risk level of the Client is higher:</p> <ol style="list-style-type: none"> 1. The Client is a person associated with a PEP 2. The client is PEP or local PEP 3. The actual place of residence or employment or business of a Client is in a country, which is included in the list of risk countries 4. The Client is suspected to be or to have been linked with a financial offense or other suspicious activities 5. The Client is a non-resident individual, whose place of residence or activities is in a country, which is listed in the list of risk countries. 6. In a situation with higher risk of Money Laundering and terrorists financing.

NORMAL MEASURES	ENHANCED MEASURES	ESCALATED MEASURES
<ol style="list-style-type: none"> 1. The Client can be identified on the basis of publicly available information; 2. The ownership and control structure of the Client is transparent and constant; 3. The operations of the Client and their accounting or payment policies are transparent; 4. Client reports to and is controlled by an authority of executive power of Estonia or a contracting state of the European Economic Area, another agency performing public duties, or an authority of the European Union. 	<p>In addition to normal measures the following is included: Identification of a natural person (Identification details and copy of ID documents), video call in case of deposit of more than 50,000 USD or equivalent.</p> <ol style="list-style-type: none"> 1. Identification of a legal person (Corporate details, Certificate of incorporation, Articles of association, ID of representatives and shareholders) 2. The ownership and control structure of the Client is transparent and constant; 3. The operations of the Client and their accounting or payment policies are transparent. 	<p>In addition to normal measures the following is included:</p> <ol style="list-style-type: none"> 1. Identification and verification of a Client on the basis of additional documents, data or information, which originates from a reliable and independent source 2. Identification and verification of a Client while being present at the same place 3. Asking the identification or verification documents to be notarized or officially authenticated 4. Obtaining additional information on the purpose and nature of the Business Relationship and verification from a reliable and independent source 5. Reassessment of a risk profile of a Client not later than 6 months after establishment of Business Relationship.

HIGH RISK COUNTRIES

1. Countries which according to FATF does not follow requirements of prevention of Money Laundering and Terrorism Financing. You can find it here: <http://www.fatf-gafi.org/countries/#high-risk>
2. Countries which according to the FIU are under the threat of terrorism: Afghanistan, Algeria, United Arab Emirates, Bahrein, Bangladesh, Egypt, Iraq, Iran, Yemen, Jordanian, Qatar, Kuwait, Lebanon, Libya, Mali, Morocco, Mauritania, Nigeria, Oman, Pakistan, Palestine, Saudi Arabia, Somalia, Sri Lanka, Sudan, Syria, Tunisia, Turkey, Ethnic groups of Caucasus belonging to Russian Federation (Lesgid, Ossetians, Chechens, Ingushes etc.)

Please read our **Risk policy (/documents/riskpolicy.pdf)** for more details on trading risk. If you have further questions please do not hesitate to **Contact us**.

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Risk Warning: CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 90% of retail investor accounts lose money when trading CFDs with this provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money. You should be fully aware of all risks involved in the margin trading and should seek professional advice from an independent financial advisor if you have any doubts.