



KYC POLICY

Version 04.2023



TABLE OF CONTENTS

1. What is money laundering?	3
2. Laws against money laundering	3
3. Client identity verification procedure	3
4. Compliance with the Privacy Agreement.....	3
5. Documents required.	4

1. What is money laundering?

Modern society currently faces a serious challenge in preventing money laundering, e.g. making the possession, use, or disposal of money or other property obtained from criminal activities appear to be legal, and terrorism financing - providing or gathering money or rendering financial services with the knowledge that the money is intended to finance the organization, preparation for, or execution of terrorist acts or to support a criminal society (criminal organization) created or being created to perform terrorist acts.

Individuals and legal entities whose income is earned illegally make various attempts to legalize their income. For example, they may use other people's personal data, including data that has been acquired fraudulently. This may become a problem for people who become victims of fraud and are uninvolved in these parties' criminal activities.

2. Laws against money laundering

To prevent money laundering, organizations performing operations with money or other property are obligated to comply with anti-money laundering laws of their local regulatory framework.

For FS International Limited, this will be the Anti-Money Laundering and Counter-Terrorism Financing [Act No. 13 of 2014](#). The latter Act requires the verification of the identity of potential clients and assist government agencies and financial organizations working to combat money laundering. FS International Limited has to comply and to ensure compliance with the requirements of the Act against money laundering and financing terrorism.

3. Client identity verification procedure

To ensure Compliance with the AML & CTF ACT requirements, the client identification procedure has to be performed prior of the establishment of any business relationship; thus, it is performed during the registration process.

Ongoing monitoring of the identification and verification procedures is performed on various types of non-trading operations, and as part of monitoring by our designated teams.

For the identification and verification procedures of our clients, [b-investor.com](#) requires personal data and take steps to confirm the validity and accuracy of this information using a verification system developed by our specialists.

The identification and verification procedure may take several working days to be completed; however, the process must be completed within the timeline of fifteen (15) working days. Failure to complete the process within the aforesaid timeline will mean that the registration is revoked.

4. Compliance with the Privacy Agreement

The personal data we receive is handled in accordance with the provisions of the Privacy Agreement.

As noted above, the reason for requesting and collecting personal data and documents is for the identification and verification procedure, as required by the relevant AML & CTF Act. It does not mean that the Company has suspicions that you are committing or are involved in any illegal acts.

Accordingly, your cooperation and understanding of these steps is necessary to effectively combat money laundering and financing terrorism. Each of the affiliates of the Company is required to comply with AML and KYC policies.

All identification documents and services records shall be kept for the minimum period of time required by local law.

All new employees shall receive anti money laundering training as part of the mandatory new-hire training program. All applicable employees are also required to complete AML and KYC training annually. Participation in additional targeted training programs is required for all employees with day-to-day AML and KYC responsibilities.

5. Documents required.

To ensure compliance with the requirements of the AML & CTF Act, *Expertltd* requires the following, (*but no exhaustive*) documents from potential clients' who register with the Company:

Physical Persons	Legal Persons / Corporate Accounts
<ul style="list-style-type: none"> <input type="checkbox"/> Proof of Identity: this can be a Passport or a National Identity card or a Driving license. <i>Please ensure that the document is valid (i.e. not expired) and that the provided copy is clearly readable.</i> <input type="checkbox"/> Proof of address: this can be a utility bill (water, electricity, gas, internet, landline), bank statement, residence certification, tax return documentation or a recent payslip. <i>Please ensure that the document is on your name and contains your full address. The document cannot be older than six (6) months.</i> - Selfie - from the value of 10,000USD deposit AML and CDD <ul style="list-style-type: none"> - Source of funds declaration and document - Source of fund from value of 10,000USD deposit - - Checking Persons or PEPs defined by FATF recommendations are also included in this category - Transactions involving accounts with insufficient customer due diligence who have refused or avoided 	<ul style="list-style-type: none"> <input type="checkbox"/> Certificate of Incorporation <input type="checkbox"/> Certificate of Director(s) and Secretary <input type="checkbox"/> Certificate of Registered Office <input type="checkbox"/> Certificate of Beneficiary Owner(s)/Shares certificate <input type="checkbox"/> Certificate of Incumbency/Good Standing <input type="checkbox"/> Memorandum & Articles of Association of the Company <input type="checkbox"/> The Company's latest audited financial statements or the Company's latest management accounts or a Trial Balance signed by the company's accountants & director(s) or any other documentation which indicates the current financial situation of the Company. <input type="checkbox"/> Proof of identity and proof of current home address of every Shareholder that has 10% or more shares. <input type="checkbox"/> A resolution by the Board of Directors of the Company for the opening of a trading account with Expertltd and to whom they grant authority to operate the trading account. Full KYC documentation of the person who will operate <input type="checkbox"/> the trading account and at least one Director of the Company. Specifically:

<p><i>inquiries for identifying information.</i></p> <ul style="list-style-type: none">- <i>Transactional behavior: Suspicious cryptocurrency transaction patterns, such as high transaction frequency in a short period of time or quick deposits and withdrawals of funds into a newly formed account.</i>- <i>Different IP registrations</i>- <i>Geographical risks: transactions that are carried out into or out of high-risk nations or jurisdictions, or that send currency to exchange outside of the customer's home country</i>	<ul style="list-style-type: none">• Proof of Identity – this can be a copy of your international Passport or Identity Card and Driver's license. Please provide front and back side of the document. Note that document must be valid and provided copy must be in color and clearly readable.• Proof of Address – this can be an official documentation of your utility bill (gas, water, electricity or landline/ internet), bank / card statement, residence certificate on income tax bill showing your name, address and issue date. Note that the document cannot be older than 6 months. <p>☐ The Company's documentation must be recent and original or certified as true copies of the original. In addition, corporate account application form is required to be filled.</p>
---	--

*Furthermore, b-investor.com may further request, in specific cases, enhanced due diligence documentation. For example, additional documentation of Proof of Identity (POI) and Proof of Address (POA) (please refer to the table above for the acceptable documentation).