



## **Anti-Money Laundering Policy and Know Your Customer Policy**

The Anti-Money laundering procedures that EGM FINANCE implements is to ensure that users engaging in certain activities are identified to a reasonable standard, while minimizing the compliance burden and impact on legitimate users.

Money Laundering is the act of converting money or other monetary instruments gained from illegal activities into money or investments that appear to be legitimate, so that its illegal source cannot be traced. Domestic and international laws that apply to companies, whose users can deposit and withdraw funds from their accounts, make it illegal for EGM FINANCE, or its employees or agents, to knowingly engage, or attempt to engage in a monetary transaction in criminally derived property.

### **Implemented Procedures**

The objective of Anti-Money laundering procedures that EGM FINANCE implements is to ensure that users engaging in certain activities are identified to a reasonable standard, while minimizing the compliance burden and impact on legitimate users. We are committed to establishing and maintaining policies, controls and procedures to manage and effectively mitigate the risks of money laundering and terrorist financing. These policies will be regularly reviewed to ensure that they remain fit for purpose and will include:

- The risk management practices adopted by EGM FINANCE to prevent its business being used for money laundering and/or terrorist financing.
- Customer due diligence requirements.
- Record keeping.
- Monitoring compliance with its policies, controls and procedures.

In order to minimize the risk of money laundering and financing terrorist activities, EGM FINANCE neither accepts cash deposits nor disburses cash under any circumstances. EGM FINANCE reserves the right to refuse to process a transfer at any stage, where it believes the transfer to be connected in any way to money laundering or criminal activity. For the avoidance of any doubt, EGM FINANCE may detain or postpone payments for a set period of time at its own discretion. It is forbidden for EGM FINANCE to inform users that they have been reported for suspicious activity.



### **Customer Due Diligence**

EGM FINANCE applies Know Your Customer (KYC) verification. This is a vital process in ensuring a user (includes reference to “customer”) is able to access our services and platform. Failure to provide us with the required documents may have an adverse effect on a user’s trading, deposits and withdrawals.

#### **For individuals:**

**Photo identification** showing full name which corresponds to the name in which the customer account is being opened. Any one of the following is acceptable:

- Passport
- Driving license (if contains photograph of individual)
- National ID Card
- Armed Forces ID Card

#### For all Passports/Identity Documents ensure the following:

- The document is valid and shows the issue and expiry dates
- The photograph is clear and all features are visible
- The page showing signature is included
- The place of issue and passport number details are included and are clearly legible
- Nationality details are included

**Proof of residential address** which shows the name of the customer opening the account (documents showing joint names for couples are acceptable). Any one of the following is acceptable:

- Valid, full driving license (unless already provided as proof of identity)
- Utility bill (such as gas, water, electricity, although NOT a mobile phone bill)

All documentation must be from a recognised or verifiable provider and must not be more than three months old. EGM FINANCE reserves the right to request additional professional references for KYC purposes in its absolute discretion.



**For companies and other corporate bodies:**

Each of the following:

- Certificate of incorporation and memorandum and articles of association
- Latest annual return
- Latest statutory report and accounts
- Current shareholder and director registers
- Resolution of the Board of Directors to open an account and identification of those who have authority to operate the account
- Full KYC documentation on each director (see “for individuals” above)
- Full KYC on any company which controls the company applying for the EGM FINANCE account.
- Full KYC documentation on each ultimate beneficial owner of more than 20% of the company’s share capital. Where there are corporate shareholders, documentation confirming the identity of the ultimate individual beneficial owners must be provided.

**Retention of KYC Documentation**

EGM FINANCE will retain copies of all documentation provided for the legally required period. Such documentation and personal data contained therein will only be used for EGM FINANCE’s internal compliance purposes. Kindly refer to our Privacy Policy.

**Deposits and Withdrawals** EGM FINANCE requires all deposits, where the name of the originating customer is present, to come from the name matching the name of the customer in our records. A confirmation of deposit form may be required to be completed by users.

As for withdrawals, money may be withdrawn from the same account and by the same way it was received. For withdrawals where the name of the recipient is present, the name must exactly match the name of the customer in our records. If the deposit was made by wire transfer, funds may be withdrawn only by wire transfer to the same bank and to the same account from which it originated. If the deposit was made by means of electronic currency transfer, funds may be withdrawn only by the means of electronic currency transfer through the same system and to the same account from which it originated.

**General**

EGM FINANCE may from time to time require additional forms to be completed and or documents to be provided, under the instruction and guidance of our Compliance team.