

ANTI-MONEY LAUNDERING POLICY

Update Date: December 2022

ANTI-MONEY

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INTRODUCTION

OneRoyal Financial Trading (Cy) Ltd (hereinafter "the Company"), is registered under Cyprus Company Law with registration number HE349061. The Company is authorized and regulated as a Cyprus Investment Firm (CIF) by the Cyprus Securities and Exchange Commission (CySEC), License Number 312/16, under the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017) ("the Law"), as amended from time to time, and subject to CySEC Laws and Regulations. The Company's head office is located at 152 Franklin Roosevelt Avenue, Limassol, 3045, Cyprus.

The Company is operating under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (the "Markets in Financial Instruments Directive 2014/65/EU" or "MiFID II") and amending Directive 2002/92/EC and Directive 2011/61/EU, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016 and under Regulation (EU) No 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (the "MiFIR") which was implemented in Cyprus by the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), which provide for the provision of Investment Services, the exercise of Investment Activities, the operation of Regulated Markets and other related matters (the "Investment Services and Activities and Regulated Markets Law"), as the same may be modified and amended from time to time.

The Company collects and verifies the personal identification information of all account holders, and subsequently logs and tracks the transactions that are carried out by its clients. In order to open an account with the Company, a valid form of government-issued identification (Passport or a National ID and Driver's License), a proof of residence and bank account information is required, along with a completed account application.

It should be noted that the Company tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.

- The Company carries out its activities in line with the anti-money laundering framework as laid out by the Financial Action Task Force.
- All client funds are held in segregated accounts that are designated solely for each individual client for deposit and withdrawal purposes.
- The Company monitors funding from bank accounts held outside the account holder's home country.
- The Company does not accept deposits nor disbursements to third parties under any circumstances.
- The Company matches each deposit to the account name held on file for that client.
- The Company reserves the right to refuse to process any transaction which it believes to be connected, in any way, to money laundering or criminal activity. In accordance with international law, the Company is under no obligation to inform the client when suspicious activity is reported to any corresponding regulatory or legal bodies.

MAIN OBJECTIVE

- Combating and preventing money laundering and terrorist financing and taking all the necessary preventive measures.
- Preventing the misuse of the Company by anyone or anybody in illegitimate operations.
- Determining the legal and administrative responsibilities of the Company and of all its employees related to anti-money laundering.
- Reporting the suspicious operations which include the probable activities of money laundering and terrorist financing to the competent authorities.
- Training all employees on the rules and internal procedures which have to be observed, the risks that they and the Company face and how they can encounter the risks of money laundering and terrorist financing through their operations from their positions.

ACCOUNT OPENING REQUIREMENTS - KNOW YOUR CLIENT POLICY (KYC)

The Company is committed to the prevention of money laundering activities through our services and, as such, comply with regulatory requirements such as:

- Identifying our clients;
- Identifying, monitoring and reporting any kind of suspicious transactions;
- Maintaining transaction records for a minimum of five (5) years after the termination of our contractual relationships or an occasional transaction with our clients, unless the retention period has to be extended to additional five years, for the purposes of prevention, detection or investigation of money laundering and terrorist financing, and after carrying out an assessment of the necessity and proportionality of such further retention.
- Training our staff to recognize suspicious transactions and to fulfil all reporting obligations;
- Depending on client location, report any suspicious activities to authorities.

In order to open a trading account with the Company, the potential client must be over 18 years old. In addition, the steps listed below must be followed:

- (a) complete the account opening application, which includes providing personal information (name, date of birth, etc), information relating to his/her economic profile (annual income, estimated net worth, employment status, etc.)
- (b) complete the appropriateness test (knowledge and experience)
- (c) provide identification documents which consist of a valid form of government-issued identification and a proof of residence

Please note that from the day of receipt of the account opening application a timeframe of 15 days is given to provide the required information and documentation. If the potential client fails to provide these within the aforementioned timeframe, the Company will decline the application and in case of any deposits, will refund the available balance back to the method used to deposit the funds. Furthermore, if this is the case, the Company will also proceed with the closure of any open positions in the client's account, by using the previous' day closing price.

PROOF OF IDENTITY

The following documentation are acceptable forms of proof of identification

- A valid passport ; or
- A valid National Government Identity Card and a Driving License
- A valid residence permit

The document must be issued on your name and all information on the document including your photo must be visible. All of the above types of identification must be provided in clear (preferably coloured) copy ensuring that all the below information can be seen:

- *Full name
- *Photo
- *Date of Birth
- *Place of Birth/Nationality
- *ID number/Unique Document Reference Number
- *Issuing Authority
- *Issue Date
- *Expiry Date

All 4 corners of the document must be shown and both sides of the identification card must be provided, where applicable. (Please note that all proof of identity documents are verified/screened through third-party compliance software.)

PROOF OF RESIDENCE

The following are acceptable forms of proof of residence:

- A utility (electricity, gas, water bill) or phone bill (landline only, Internet bill)
- A local authority tax bill
- A bank statement

(Please note that proof of residence must be recent, (i.e. not older than 6 months) and must show your name, permanent address and date of issue. The company reserves the right to request additional documents from its clients whenever it deems necessary.

TIN – TAX IDENTIFICATION NUMBER (SELF CERTIFICATION – CRS REPORTING PURPOSES)

The Investment Firms being the reporting financial institutions are required to maintain account opening processes that facilitate collection of a self-certification at the time of the account opening, whether that process is done face-to-face, online or via telephone. Therefore, the Company must request certification which must also include the Account Holder's Tax Identification Number (TIN).

BANK ACCOUNT REQUIREMENTS

- OneRoyal account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

FUNDS WITHDRAWAL PROCEDURE

The withdrawal procedure at OneOneRoyal, detailed below, follows the strict principle that ensures funds are securely remitted back to their originating source.

- OneOneRoyal clients must complete a digital withdrawal request online via the "Client Area" containing inter alia, their correct account information.
- The Back-office department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and proceed with the withdrawal request.
- Withdrawal requests are processed on the same day that the request to withdraw funds was made, or the next working day if the client's request is received outside of normal trading/business hours.
- Please note that the Company's policy is to refund back to the source of the original deposit provided.
- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by OneRoyal Compliance and Management.
- OneRoyal AMLCO and Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

COMPLIANCE FOOTNOTE

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by OneRoyal. A detailed copy of our AML policy is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning OneRoyal's policies, please contact us. No substitutions or modifications will be accepted to the requirements above. OneRoyal reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to OneRoyal is available to the competent regulatory authorities in

- (a) the country of incorporation of OneRoyal, i.e. the Republic of Cyprus;
- (b) the country of origin of any funds transmitted to OneRoyal; and
- (c) the destination country of any funds refunded by or withdrawn from OneRoyal.

OneRoyal does not allow the provision of investment and ancillary services in case the funds of the clients are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

OneRoyal reserves the right to review and/or amend its Anti-Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.