



## **Anti-Money Laundering Policy and KYC Procedure**

### **INFORMATION IN RELATION TO ANTI-MONEY LAUNDERING AND TO COUNTER TERRORISM FINANCING**

Smarttool Trading SC Limited (hereinafter referred to as the "Company"), is a Seychelles Investment Firm registered with the registrar of Companies (Registration No. 8424753-1) and regulated by the Financial Services Authority of Seychelles (hereinafter "FSA") under License Number SD034.

The Company does its utmost to ensure the privacy, confidentiality and security of its clients are preserved both throughout their interaction with the company and afterwards, to the fullest extent achievable by the Company. At the same time, the Company is obliged to follow certain requirements as set out by the local regulator for preventing and suppressing money laundering activities. As such, the Company is obliged to follow strict Anti-Money Laundering (AML) and Counter Terrorism Financing procedures while it is also required to obtain certain verification information as well as documentation.

The Company determines the identity of the beneficial ownership of all its clients' accounts and does not open or maintain such accounts, unless it is satisfied with this requirement, as stipulated in the AML Policies and the legislative requirements. It has established procedures to obtain appropriate evidence of client identity and maintains adequate records of client identity and transactions involved in such a manner as to assist, if necessary, in the investigation of criminal offences.

The Company has in place policies and procedures to identify and avoid money laundering related transactions and to ensure compliance with the requirements of any relevant legislation issued by its regulator.

The Company is vigilant in ensuring the prevention of its involvement or misuse in money laundering activities and is not knowingly accepting assets or entering into business relationships where there is reasonable cause to believe that such assets may have been acquired illegally or may represent the proceeds of criminal activity.

The Company shall promptly report suspicious transactions relating to any account to the Supervisory Authority. Where there is suspicion that the source of funds may be criminal or that a client may be involved in criminal activity, the Company shall follow established procedures for assessing the evidence and determine what course of action should be pursued.

The Company shall keep records of reports made by their staff and of reports made to the Supervisory Authority. In accordance with the AML Code, the Company establishes the identity and verifies the identity of any Client of the Company by requiring the customer to produce an identification record or such other reliable, independent source document. The Company maintains the right to request any additional documentation that might be deemed necessary at any point in the business relationship.

The Company shall:

- a) obtain information on the purpose and nature of the business relationship when establishing a new business relationship

- b) adequately identify and verify the identity of any natural person when a transaction is conducted including information relating to:
  - the person's name and residential address;
  - the national identity card, social security document, passport or other applicable official identifying document.
- c) adequately identify the beneficial owner of any legal entity conducting a transaction with the Company and take reasonable measures to identify and verify its ownership and control structure, including information relating to:
  - the customer's name, legal form, head office address and identities of directors;
  - the principal owners and beneficiaries and control structure;
  - provisions regulating the power to bind the entity and to verify that any person purporting to act on behalf of the customer is so authorized, and identify those persons;
- d) have appropriate risk management systems to determine if a customer or beneficial owner is a politically exposed person, and if so, shall:
  - adequately identify and verify his identity as set out in this section;
  - obtain the approval of senior management before establishing a business relationship with the politically exposed person;
  - take reasonable measures to establish the source of funds and source of property;
  - and conduct regular enhanced monitoring of the business relationship.

The Company will not accept cash deposits, deposits using cash-related methods, or transactions related to cryptocurrencies.

Should you require any further information and/or have any questions about this document please contact us.