

ANTI-MONEY LAUNDERING POLICY

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

IMPLEMENTED PROCEDURES

The objective of the Anti-Money laundering procedures that IMPEX TRADING Limited implements is to ensure that customers engaging in certain activities are identified to a reasonable standard, while minimizing the compliance burden and impact on legitimate customers. IMPEX TRADING Limited is committed to assisting governments to combat the threat of money laundering and the financing of terrorist activities around the world.

For this purpose, IMPEX TRADING Limited has established a highly sophisticated electronic system. This system documents and verifies client identification records, and tracks and maintains detailed records of all transactions.

IMPEX TRADING Limited carefully tracks suspicious and significant transaction activities, and reports such activities “providing timely and comprehensive information” to law enforcement bodies. To uphold the integrity of reporting systems and to safeguard businesses, the legislative framework provides legal protection to providers of such information.

In order to minimize the risk of money laundering and financing terrorist activities, IMPEX TRADING Limited neither accepts cash deposits nor disburses cash under any circumstances. IMPEX TRADING Limited does not process fund transfers to any third-party beneficiary and reserves the right to refuse to process a fund transfer at any stage, where it believes the fund transfer to be connected in any way to money laundering or criminal activity. It is forbidden for IMPEX TRADING Limited to inform customers that they have been reported for suspicious activity.

KYC (Know Your Client) Procedures

1. The customers of IMPEX TRADING Limited are subdivided in two categories:
 - 1.1. Private Customers (natural persons) residents of any country.
 - 1-2. Corporate Customers (legal entities) residents of any country.
2. If the customer is a private person (natural person) the following documents must be collected:
 - 2.1. Full name details.
 - 2.2. Government issued Photo ID with ID number, and/or passport number (original or certified copies).
3. Proof of residency – Copy of utility bill.
4. Swift confirmation of the bank transfer. The information of the bank account showed on the SWIFT must be identical to (1) and (2) above. Otherwise, the deposit must be returned to the same bank account it came from, immediately, without crediting the trading account.
5. Withdrawals must be made to the same bank account the money was deposited from (to prevent money transfer between different entities’ bank accounts, through the Company), and in the same currency (to prevent currency changes through the Company).

6. If the original account is no longer available, funds may be transferred to a different account of the same entity (you will need to get a copy of a check or other instrument proving the new account ownership), in the same currency and into the same country the original deposit was made from.

7. If the customer is a corporation (legal entity) the following documents must be collected:

7.1. All statutory documents (Certificate of incorporation, memorandum and articles of association), and amendments to them (original or certified copies).

7.2. Details on the shareholders, directors and ultimate beneficial owners (same details as those for natural persons described above).

7.3. Powers of attorney for the persons carrying out interaction with the Company on behalf of the Customer (issuing orders, signing documents for opening the account and other procedures).

FAQ – frequently asked questions

1. One can NOT deposit from a company he owns – to his personal trading account, and vice versa.

2. One cannot get deposits from his brother/mother/other relative bank account; unless that relative joins the trading account (signs the trader agreement).

3. Cash deposits to the Company's account by traders are forbidden. If such a deposit did occur, then in case of a withdrawal request, the trader will need to supply bank account details of the person who made the cash deposit, with a written proof of the account details (check, credit card etc.).

4. Do not credit a trading account before the deposit was complete (i.e. the required business days (usually three) have passed following the deposit). Do not credit the trading account based on future payments or checks.

5. A client cannot transfer funds between trading accounts not under his own name.