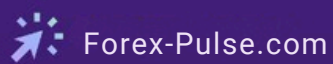




# AML & KYC Policy



1. The Company
2. Scope
3. Legal and Regulatory Framework
4. Compliance with the AML/CFT Legislation
5. AML Compliance Vigilance
6. Monitoring Clients' Activity
7. Deposit and Withdrawal Requirements
8. Disclaimers
9. Contact Details

## 1. The Company

Forex Pulse Ltd is a financial services company incorporated under the Laws of Mauritius, under registration number 189336 and having its registered office at the Cyberati Lounge, Ground Floor, the Catalyst, Silicon Avenue, 40, Cybercity, 72201, Ebene, Mauritius, the Company is governed by all applicable local legislations. The Company is a Licensed Investment Dealer, authorised and supervised by the Mauritius Financial Services Commission ("FSC") (hereinafter also called the "Regulator") under Full Investment Dealer (Excluding Underwriting) with License No. GB22200548, in accordance with the provisions of the Law, Directives and Circulars issued by the Commission and legislation governing the roles and responsibilities of the Regulator.

## 2. Scope

Forex Pulse Ltd (hereafter the "Company") has established and implemented appropriate policies and procedures, in order to achieve the timely and continued compliance of the Company with the current Anti-Money Laundering ("AML") and Combating the Financing of Terrorism ("CFT") regulatory framework.

The primary objective of this document is to lay down the Company's internal policies, practices, measures, procedures and controls relevant to the prevention of Money Laundering and Terrorist Financing. These policies and the processes adopted, help the Company to comply with its obligations under the various laws, regulations and industry best practices. Moreover, the procedures are designed to:

- a. Identify and/or assess the potential money laundering and terrorist financing ("ML/TF") risks to which it may be exposed from the provision of a designated service i.e. that the provision of a designated service by Amega Global Ltd might (whether inadvertently or otherwise) involve or facilitate money laundering or the financing of terrorism; and
- b. Manage and/or mitigate those risks within the applicable legislative framework.

### 3. Legal and Regulatory Framework

For the purposes of this document the term “Applicable Legislation” shall include:

- Financial Intelligence and Anti-Money Laundering Act 2002 as complemented by the FIAML Regulations 2018
- Prevention of Terrorism Act 2002 as complemented by Regulations
- Prevention of Corruption Act 2002
- The Anti-Money Laundering and Combating of the Financing of Terrorism and Proliferation (Miscellaneous Provisions) Act 2019
- The Anti-Money Laundering and Combating of the Financing of Terrorism and Proliferation (Miscellaneous Provisions) Act 2020
- FSC Guide to Fitness and Propriety
- Guidelines on the Implementation of Targeted Financial Sanctions under the United Nations (Financial Prohibitions, Arms Embargo and Travel Ban) Sanctions Act 2019 issued on 25 August 2020 by the National Sanctions Secretariat
- FSC Communique on the Guidelines on the Implementation of Targeted Financial Sanctions under the United Nations (Financial Prohibitions, Arms Embargo and Travel Ban) Sanctions Act 2019 issued on 25 August 2020
- FDC Anti-Money Laundering and Combating the Financing of Terrorism Handbook 2020, last updated on 31 March 2021 and revisited in September 2022
- The Securities (Amendment) Act 2021

### 4. Compliance with the AML/CFT Legislation

The Company has developed and implemented a compliance program consisting of policies, procedures, transaction monitoring systems, internal controls and personnel training in line with applicable laws and regulations, as well as with international best practices. The AML/CFT Program, which employs a risk-based approach to managing the Company's AML risk, includes, but is not limited to:

a. Customer On-boarding Policy

- Defining the policy and process followed during on-boarding of new clients in order to adequately follow the applicable legal and regulatory framework Risk-based Approach AML/CFT Risk Assessment and Risk Management :the
- establishment of a Firm Wide Risk Management Framework to identify all quantifiable AML risks (inherent risk and residual risk) and to assist the Board of Directors in defining the Company's risk appetite Customer Due Diligence, which incorporates "KnowYourCustomer" or "KYC"
- Procedures for the identification and verification of the identity our customers, including, where applicable, their respective beneficial owners Identification and execution of enhanced due diligence measures for
- monitoring high-risk clients, including Politically Exposed Persons (PEPs), their relatives and close associates Senior management review and approval of high-risk customers, including Politically Exposed Persons

c. Customers Screening

- The adoption of policies and procedures to ensure compliance with the applicable restrictive measures (i.e. EU/UN/OFAC sanctions) and that the Company does not engage in any activity for, on behalf of, for the benefit of, any individual, entity or organisation subject to sanctions or maintain a relationship with a person against whom enforcement measures are affected. In this respect, ongoing customer screening is performed against a global collection of sanctions, Politically Exposed Persons, Adverse Media and Enforcement Data.

d. Ongoing Monitoring of Customers and Reporting

- The establishment of systems and processes to monitor account activity and customer transactions Reporting creation , tracking and filing of Suspicious

e. Activity Reports (SARs) and

- Suspicious Transactions Reports (STRs) to the appropriate regulatory authority where required Record Retention The retention of customer and transaction records for a period of five (5) years after the termination of business relationship with customers, or transaction execution date

- g. Training The provision of adequate and frequent AML/CFT training for
  - Company employees, relevant to the role they undertake, for the purpose of prevention of money laundering and terrorist financing
- h. Independent Assessment
  - An independent audit review function to test head equacy of the Company's anti-money laundering policies and procedures on an annual basis.

## 5. AML Compliance Vigilance

The Company is fully committed to remaining vigilant to prevent the use of its products and services by those who seek to abuse them. It continually seeks to combat money laundering and terrorist financing through the prevention, detection and reporting of unusual or suspicious behavior.

In addition, the Company constantly assesses the effectiveness of its existing policies, procedures and technologies and updates them as needed to address the changing environment. The Company also established an employee training program to ensure that the staff is well-informed about the evolving technique used by criminals to penetrate the system and employees are well-equipped to combat money laundering and other financial crimes.

The fight against money laundering is a never-ending and ever-changing process. At Amega Global Ltd, we recognise that preventing money laundering and identifying potential terrorist financing activities involves constant vigilance and the ability to keep up with criminals' sophisticated schemes. We acknowledge that we must constantly work to identify and understand the potential risks of money laundering and terrorist financing and implement appropriate processes to mitigate and eliminate such risks. Before opening an account, the Company shall see to it that

satisfactory and competent evidence is properly obtained on the identity of their clients and that effective procedures have been followed for such verifications especially on new clients.

The Company always requires its clients to submit information particularly on the source of funds.

The Company might refuse to execute a particular transfer of funds if it believes these to be related in any way to money laundering.

Based on the risk, the Company analyzes any logical inconsistencies in the information or behavior of its clients. If a potential or existing client either refuses to provide the information described in our Terms of Use, or appears to have intentionally provided false information, a new account will not be opened and, after evaluating the risks involved, will consider closing any existing account.

## 6. Monitoring Clients' Activity

The Company monitors suspicious and revenue-intensive transactions closely, takes timely, appropriate actions on said transactions and informs the appropriate bodies without undue delay.

The system of monitoring implemented by the Company relies both on automated monitoring and, where appropriate, manual monitoring by the staff.

## 7. Deposit and Withdrawal Requirements

The Company monitors funding from various bank accounts outside of the account holder's home country. In case of bank transfer or transfer from a bank card, the name indicated during the registration must match the name of the owner of the account/bank card.

The Company neither accepts cash deposits nor disburses cash under any circumstances.

The withdrawal process detailed below is structured around strict guidelines to make sure that funds are securely sent back to their originating source and beneficiary:

- Our customers must submit a withdrawal request containing their correct account information
- All withdrawal forms are submitted to our accounts department for processing. Our Accounts department confirms the account balance, verifies that there are no holds or withdrawal restrictions on the account, and then approves the withdrawal request, pending compliance approval
- Our Accounts department reviews all withdrawal requests, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file. Our accounts department examines the withdrawal request against the customer's deposit history to make sure there is no suspicious activity and verifies the bank account on file
- Withdrawal requests approved are processed by the accounts department and the funds are released to the client
- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by our compliance department; and
- Our Management will work with the Compliance department to see if further action is needed and if any relevant regulatory bodies need to be contacted.

## 8. Disclaimers

The Money Laundering Prevention Policy is a policy only and it is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have.

The Company reserves the right to refuse to process a transfer of funds at any stage if it believes it to be connected in any way to criminal activities or money laundering.

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



## 9. Contact Details

In case you need any further information about our Anti-Money Laundering and KYC Policy, please contact our Compliance Department at [compliance@forex-pulse.com](mailto:compliance@forex-pulse.com).