

Manual for The Prevention of Money Laundering and Terrorist Financing Risk Based Approach Know Your Client Guidelines

1. General Definitions

For the purposes of this Manual, and unless the context otherwise requires:

'Act' means the Proceeds of Crime Act, 2013;

'AML/CFT Compliance Officer' means the person appointed by TIO Markets Ltd. as its AML/CFT compliance officer under the Regulations;

'AML/CFT Reporting Officer' means the person appointed by TIO Markets Ltd. as its AML/CFT reporting officer under the Regulations;

'Beneficial Owner' means

- (a) an individual who is an ultimate beneficial owner of the Legal Person, partnership or legal arrangement, whether or not the individual is the only beneficial owner; and
- (b) an individual who exercises ultimate control over the management of the Legal Person, partnership or legal arrangement, whether alone or jointly with any other person or persons, regardless of whether the ultimate ownership or control is direct or indirect. For the avoidance of doubt, an individual is not deemed to be the Beneficial Owner of a company, the securities of which are listed on a recognized exchange;

'Business Relationship' means a business, professional or commercial relationship between TIO Markets Ltd. and a customer which is expected by TIO Markets Ltd., at the time when contact is established, to have an element of duration;

'Customer Due Diligence Information' means Identification Information and Relationship Information;

'Customer Due Diligence Measures' means

- (1) the measures for:
 - (a) identifying a customer;
 - (b) determining whether the customer is acting for a Third Party and, if so, identifying the Third Party;
 - (c) verifying the identity of the customer and any Third Party for whom the customer is acting;
 - (d) identifying each Beneficial Owner of the customer and Third Party, where either the customer or Third Party, or both are not individuals;
 - (e) taking reasonable measures, on a risk-sensitive basis, to verify the identity of each Beneficial Owner of the customer and Third Party so that TIO Markets Ltd. is satisfied that it knows who each Beneficial Owner is, including, in the case of a Legal Person, partnership, Foundation, trust or similar arrangement, taking reasonable measures to understand the ownership and control structure of the Legal Person, partnership, Foundation, trust or similar arrangement; and
 - (f) obtaining information on the purpose and intended nature of the Business Relationship or Occasional Transaction. Such measures include where the customer is not an individual, measures for verifying that any person purporting to act on behalf of the customer is authorized to do so, identifying that person and verifying the identity of that person.

(2) Where TIO Markets Ltd. is required to verify the identity of a person, it shall verify that person's identity using documents, data or information obtained from a reliable and independent source.

'Director' in relation to a Legal Person means a person appointed to direct the affairs of the Legal Person and includes a person who is a member of the governing body of the Legal Person and a person who, in relation to the Legal Person, occupies the position of director by whatever name called;

'Domestic Politically Exposed Person' means a person who is or has been entrusted with a prominent public function by the State;

'FATF' means the international body known as the Financial Action Task Force or such other international body as may succeed it;

'FATF Recommendations' means the FATF Recommendations, Interpretive Notes and Glossary issued by the FATF in February 2012, incorporating such amendments as may from time to time be made to the Recommendations or such document or documents issued by the FATF as may supersede those Recommendations;

'Foreign Politically Exposed Person' means a person who is, or has been entrusted with a prominent function by an international organisation;

'Foundation' means a foundation, wherever established;

'Identification Information' is information used to identify a person required by the Regulations to be identified and as specified in the Code;

'Intermediary' means a person who has or seeks to establish a Business Relationship or to carry out an Occasional Transaction on behalf of his or her customer with TIO Markets Ltd., so that Intermediary becomes a customer of TIO Markets Ltd.;

'Introducer' means a person who has a Business Relationship with a customer and who introduces that customer to TIO Markets Ltd. with the intention that the customer will form a Business Relationship or conduct an Occasional Transaction with TIO Markets Ltd. so that the Introducer's customer also becomes a customer of TIO Markets Ltd.;

'Legal Person' includes a company, a partnership, whether limited or general, an association or any unincorporated body of persons, but does not include a trust;

'Occasional Transaction' means a transaction that is carried out otherwise than as part of a Business Relationship, and is carried out as:

- (a) a single transaction; or
- (b) two or more linked transactions where it appears at the outset to any person handling any of the transactions that the transactions are linked or at any later stage it comes to the attention of the person handling any of those transactions that the transactions are linked, that amount to \$ 2500 where it is a transaction or linked transaction carried out on the course of a money services business or \$ 10,000 in the case of any other transaction or linked transaction;

'Ongoing Monitoring' means with regards to a Business Relationship:

- (a) scrutinizing transactions undertaken throughout the course of the relationship,

including where necessary the source of funds to ensure that the transactions are consistent with TIO Markets Ltd.' knowledge of the customer and the customer's business and risk profile; and

(b) keeping the documents, data or information obtained for the purpose of applying Customer Due Diligence measures up-to-date and relevant by undertaking reviews of existing records.

'Politically Exposed Person' means a Foreign Politically Exposed Person, a Domestic Politically Exposed Person or a person who is, or has been entrusted with a prominent function by an international organisation;

'Regulations' means the Anti-Money Laundering and Terrorist Financing Regulations of 2014, as amended from time to time, of St Vincent And The Grenadines;

'Relationship Information' means information concerning the Business Relationship or proposed Business Relationship between a TIO Markets Ltd. and its customer;

'Relevant Business' means a business which, if carried on by a person, would result in that person being a TIO Markets Ltd.;

'Terrorism, Terrorist Financing, Terrorist Financing Disclosure' are as defined in the Anti-Terrorist Financing and Proliferation Act, 2014.

'Third Party' means a person for whom a customer is acting.

2. Customer Due Diligence

2.1 TIO Markets Ltd. shall:

- (a) obtain Customer Due Diligence Information on every customer, Third Party and Beneficial Owner; and
- (b) verify the identity of the customer and any Third Party and take reasonable measures on a risk sensitive basis, to verify the identity of each Beneficial Owner in accordance with this Manual.

2.2 Customer Due Diligence Measures shall be applied:

- (a) before TIO Markets Ltd. establishes a Business Relationship or carries out an Occasional Transaction;
- (b) where TIO Markets Ltd. suspects money laundering or terrorist financing or doubts the veracity or adequacy of documents, data or information previously obtained under its Customer Due Diligence Measures or when conducting Ongoing Monitoring; and
- (c) for existing customers at other appropriate times as determined on a risk- sensitive basis and at least once every five-year period.

2.3 Customer Due Diligence Information shall be obtained where:

- (a) there is a change in the Identification Information of a customer;
- (b) there is a change in the Beneficial Ownership of a customer; or
- (c) when there is a change in the Third Parties or the Beneficial Ownership of Third Parties.

2.4 TIO Markets Ltd. may complete the verification of the identity of the customer, Third Party or Beneficial Owner after the establishment of a Business Relationship if:

- (a) it is necessary not to interrupt the normal conduct of business;
- (b) there is little risk of money laundering or terrorist financing occurring as a result; and

(c) verification of identity is completed as soon as reasonably practicable after contact with the customer is first established. Where it cannot be completed, TIO Markets Ltd. shall terminate the Business Relationship with the customer.

2.5 TIO Markets Ltd. shall conduct Ongoing Monitoring of a Business Relationship and where unable to do so, it shall terminate the Business Relationship.

2.6 Where TIO Markets Ltd. is unable to apply Customer Due Diligence Measures before the establishment of a Business Relationship or before the carrying out of an Occasional Transaction in accordance with this Manual, TIO Markets Ltd. shall not establish the Business Relationship or carry out the Occasional Transaction.

2.7 Where TIO Markets Ltd. is unable to apply the measures, verify the identity or undertake Ongoing Monitoring, it shall consider whether it is required to make a money laundering disclosure or terrorist financing disclosure.

3. Risk Based Approach

3.1 In accordance with the provisions contained in this Section 3 and in Schedule 1, TIO Markets Ltd. shall at all times apply a risk-sensitive approach to determining the extent and nature of:

- (a) the Customer Due Diligence Measures to be applied to a customer and to any Third Party or Beneficial Owner; and
- (b) its Ongoing Monitoring of a Business Relationship.

3.2 In doing so, it shall:

- (a) assess the risk that any Business Relationship or Occasional Transaction involves, or will involve, money laundering or terrorist financing, depending upon the type of customer, Business Relationship, product or transaction and consider on a risk-sensitive basis, whether further identification or Relationship Information is required;
- (b) on the basis of the Customer Due Diligence information obtained and the information obtained under paragraph (a) prepare and record a risk assessment with respect to the customer;
- (c) periodically update the Customer Due Diligence information that it holds and adjust the risk assessment it has made accordingly.

3.3 In preparing a risk assessment with respect to a customer, TIO Markets Ltd. shall take account of all relevant risks and shall consider, in particular, the relevance of the following risks:

- (a) customer risk;
- (b) product risk;
- (c) delivery risk; and
- (d) country risk.

3.4 TIO Markets Ltd. shall be able to demonstrate at all times that:

- (a) the extent of the Customer Due Diligence Measures applied in any case is appropriate having regard to the circumstances of the case, including the risks of money laundering and terrorist financing; and
- (b) it has obtained appropriate information to carry out the risk assessments required.

3.5 TIO Markets Ltd. shall, on a risk-sensitive basis, apply enhanced due diligence measures and undertake enhanced Ongoing Monitoring:

- (a) where the customer has not been physically present for identification purposes;

- (b) where TIO Markets Ltd. has, or proposes to have, a Business Relationship with, or proposes to carry out an Occasional Transaction with, a person connected with a country that does not apply, or insufficiently applies the FATF Recommendations;
- (c) where TIO Markets Ltd. has or proposes to have a Business Relationship with, or to carry out an Occasional Transaction with, a Foreign Politically Exposed Person or a family member or close associate of a Foreign Politically Exposed Person;
- (d) where any of the following is a Foreign Politically Exposed Person or a family member or close associate of a Foreign Politically Exposed Person:
 - (i) a Beneficial Owner of the customer;
 - (ii) a Third Party for whom a customer is acting;
 - (iii) a Beneficial Owner of a Third Party for whom a customer is acting;
 - (iv) a person acting, or purporting to act on behalf of the customer;
- (e) where a customer, transaction or Business Relationship involves:
 - (i) private banking, Legal Persons or arrangements, including trusts, that are personal asset holding vehicles; or
 - (ii) companies that have nominee shareholders or shares in bearer form; and
 - (f) in any other situation which by its nature can present a higher risk of money laundering or terrorist financing.

3.6 TIO Markets Ltd. shall apply the following additional measures when it is applying due diligence measures to non-face-to-face customers:

- (a) perform at least one additional check designed to mitigate the risk of identity fraud; and
- (b) apply such additional enhanced Customer Due Diligence Measures or undertake enhanced Ongoing Monitoring as it considers appropriate.

3.7 TIO Markets Ltd. is not required to apply Customer Due Diligence Measures before establishing a Business Relationship or carrying out an Occasional Transaction where it has reasonable grounds to believe that the customer is a service provider, foreign regulated person, public authority in the State or a company the securities of which are listed on a recognized exchange.

3.8 TIO Markets Ltd. shall not set up or maintain a numbered account, an anonymous account or an account in a name which it knows or has reasonable grounds to suspect, is fictitious.

4. Introducers and Intermediaries

4.1 TIO Markets Ltd. may rely on an Introducer or an Intermediary to apply Customer Due Diligence Measures with respect to a customer, Third Party or Beneficial Owner if:

- (a) the Introducer or Intermediary is a regulated person or a foreign regulated person; and
- (b) the Introducer or Intermediary consents to being relied on, and shall immediately obtain the Customer Due Diligence Information from the Introducer or Intermediary.

4.2 Before relying on the Introducer or Intermediary, TIO Markets Ltd. shall obtain adequate assurance in writing from the Intermediary or Introducer that they:

- (a) have applied the Customer Due Diligence Measures for which TIO Markets Ltd. intends to rely on;
- (b) are required to keep and do keep a record of the evidence of identification relating to each of the customers of the Intermediary or Introducer;
- (c) will without delay provide the information in that record to TIO Market or any supervisory authority if so required.

4.3 Before relying on the Introducer or Intermediary, TIO Markets Ltd. shall:

- (a) satisfy itself that the Intermediary or Introducer is a regulated person or a foreign regulated person and has all the procedures in place to undertake Customer Due Diligence Measures.
- (b) assess the risk of relying on the Intermediary or Introducer with a view to determining:
 - (i) whether it is appropriate to rely on the Intermediary or Introducer; and
 - (ii) if it considers it is so appropriate, whether it should take any additional measures to manage the risk.
- (c) obtain in writing from the Introducer:
 - (i) confirmation that each introduced customer is an established customer of the Introducer; and
 - (ii) sufficient information about each introduced customer to enable it to assess the risk of money laundering and terrorist financing involving that customer.
- (d) obtain in writing from the Intermediary sufficient information about the customer for whom the Intermediary is acting to enable the service provider to assess the risk of money laundering and terrorist financing involving that customer.

4.4 TIO Markets Ltd. shall:

- (a) make and retain records detailing the risk assessment carried out and any additional risk mitigation measures it considers appropriate; and
- (b) retain in its records the assurances and confirmations it has obtained and the information it has sought and obtained.

5. Policies, Procedures, Systems, Controls, Record Keeping and Training

5.1 TIO Markets Ltd. shall establish, maintain and implement appropriate risk-sensitive policies, procedures, systems and controls to prevent and detect money laundering and terrorist financing, including policies, systems and controls relating to:

- (a) Customer Due Diligence Measures and Ongoing Monitoring;
- (b) the reporting of disclosures;
- (c) record keeping;
- (d) the screening of employees;
- (e) internal controls;
- (f) risk assessment and management; and
- (g) monitoring and management of compliance with, and the internal communication of, its policies, systems and controls to prevent and detect money laundering and terrorist financing, including those specified above.

5.2 The policies, systems and controls must provide for:

- (a) the identification and scrutiny of:
 - (i) complex or unusually large transactions;
 - (ii) unusual patterns of transactions which have no apparent economic or visible lawful purpose; and
 - (iii) any other activity which TIO Markets Ltd. regards as particularly likely by its nature to be related to the risk of money laundering or terrorist financing.
- (b) The taking of additional measures, where appropriate, to prevent the use for money laundering or terrorist financing of products and transactions which are susceptible to anonymity; and
- (c) determining whether:
 - (i) a customer, any Third Party for whom the customer is acting and any Beneficial Owner of the customer or Third Party, is a politically exposed person or a family member or close associate of a politically exposed person;

- (ii) a Business Relationship or transaction or proposed Business Relationship or transaction is with a person connected with a country that does not apply or insufficiently applies the FATF Recommendations;
- (iii) a Business Relationship or transaction or proposed Business Relationship or transaction is with a person connected with a country that is subject to measures for purposes connected with the prevention and detection of money laundering or terrorist financing, imposed by one or more countries or sanctioned by the European Union or the United Nations.

5.3 TIO Markets Ltd. shall maintain adequate procedures for monitoring and testing the effectiveness of the policies and procedures maintained in this Section 5 and the training provided as required herein.

5.4 TIO Markets Ltd. shall keep all records in a form that enables them to be made available on a timely basis when lawfully required, to any supervisory authority or regulatory body as may be required.

5.5 The records required to be kept include:

- (a) a copy of the evidence of identity obtained pursuant to the application of Customer Due Diligence Measures or Ongoing Monitoring or information that enables a copy of such evidence to be obtained;
- (b) the supporting documents, data or information obtained in respect of a Business Relationship or Occasional Transaction which is the subject of Customer Due Diligence Measures or Ongoing Monitoring;
- (c) a record containing details relating to each transaction carried out by TIO Markets Ltd. in the course of any Business Relationship or Occasional Transaction with sufficient information to enable the reconstruction of individual transactions;
- (d) all account files;
- (e) all business correspondence relating to a Business Relationship or an Occasional Transaction.

5.6 Records shall be kept in such manner that:

- (a) facilitates Ongoing Monitoring and periodic updating;
- (b) ensures that they are readily accessible to TIO Markets Ltd.;
- (c) enables the supervisory authority, internal and external auditors and other competent authorities to assess the effectiveness of systems and controls that are maintained by TIO Markets Ltd. to prevent and detect money laundering and terrorist financing.

5.7 The AML/CFT compliance officer and other appropriate employees shall have timely access to all customer Identification Information records, other Customer Due Diligence information, transaction records and other relevant information and records necessary for them to perform their functions.

5.8 TIO Markets Ltd. shall take appropriate measures for the purposes of making employees whose duties relate to the provision of relevant business aware of:

- (a) the anti-money laundering and counter-terrorist financing policies, procedures, systems and controls maintained by TIO Markets Ltd.; and
- (b) the relevant laws relating to money laundering and terrorist financing offences, and,

shall provide them with training in the recognition and handling of:

- (i) transactions carried out by or on behalf of any person who is or appears to be engaged in money laundering or terrorist financing; and
- (ii) other conduct that indicates that a person is or appears to be engaged in money laundering or terrorist financing.

6. Compliance and Reporting Obligations

6.1 The principal functions of the AML/CFT reporting officer are to:

- (a) receive and consider internal money laundering and terrorist financing disclosures;
- (b) consider whether a suspicious activity report should be made to any regulatory authorities and if so, submit such report.

6.3 The principal function of the AML/CFT compliance officer is to oversee and monitor TIO Market's compliance with all relevant legislation for the time being in force concerning money laundering and terrorist financing.

6.4 The AML/CFT reporting officer and the AML/CFT compliance officer shall:

- (a) be an employee of TIO Markets Ltd. or of a company in the same group as TIO Markets Ltd.;
- (b) have the appropriate skills and experience and otherwise be fit and proper to act as TIO Market's AML/CFT reporting officer and AML/CFT compliance officer;
- (c) possess sufficient independence to perform his or her role objectively;
- (d) have sufficient seniority in the organisational structure of TIO Markets Ltd. to undertake his or her responsibilities effectively and in particular, to ensure that his or her requests, where appropriate, are acted upon by TIO Markets Ltd. and its staff and his or her recommendations properly considered by the board;
- (e) report regularly and directly to the board and have regular contact with the board;
- (f) have sufficient resources, including time, to perform the functions of AML/CFT compliance officer and AML/CFT reporting officer effectively;
- (g) have unfettered access to all business lines, support departments and information necessary to perform the functions of AML/CFT reporting officer and AML/CFT compliance officer effectively; and
- (h) have timely access to all records that are necessary or expedient for the purpose of performing his or her functions as AML/CFT reporting officer or AML/CFT compliance officer.
- (i)

Schedule 1 Risk Based Approach for KYC & AML

In this review of the current procedures for new client acquisition, TIO Markets Ltd. Ltd, has used information provided through the FATF website www.fatf-gafi.org

TIO Markets Ltd. Ltd, relies on the various publications of the FATF and its regional bodies (FSRBs) and updates itself on any changes during the course of the year. There are 38 members of FATF. Residents of the United Kingdom along with residents of jurisdictions who are members of the EEA and FATF are considered 'Low Risk'.

In addition, the nine FSRBs have an essential role in promoting the effective implementation of the FATF Recommendations by their membership and in providing expertise and input in FATF policy-making. Over 190 jurisdictions around the world have committed to the FATF Recommendations through the global network of FSRBs and FATF memberships.

TIO Markets Ltd. Ltd, considers these jurisdictions as 'Medium Risk' and requires a level of 'Heightened Due Diligence'. 'High Risk' and other monitored jurisdictions will be evaluated on a case by case nature as to ensure fair play in a non-prejudicial style. TIO Markets Ltd. Ltd, will NOT deal with Sanctioned jurisdictions.

Due diligence requirements for individual clients or company representatives (Table 1)

TIO Markets Ltd. Ltd has assessed its current client base and has identified that there are various levels of risks when engaging with new clients:

1. **Low and Medium risk** – where clients originate from Low and Medium Risk jurisdictions it will carry the required Due Diligence and rely on CreditSafe to validate the Client’s passport and check it against the CreditSafe sanction lists. The firm also uses information provided by the government of the United Kingdom.

2. **High risk** – Where clients originate from a High Risk Jurisdiction, it will carry Third Party checks and Enhanced Due Diligence on all new clients, requesting that all documents should be certified by a competent person.

3. **Sanction List and Very High risk** – Where individuals are from countries that are in the Sanction list or have been identified as VERY high risk, TIO Markets Ltd. Ltd will not carry any business with those individuals (See list 1 Below). Compliance maintains a FATF Country Watch List and updates it periodically.
The Account Representative prospecting the new client familiarise themselves with the various risk levels and obtain the necessary information from the client.

Due diligence requirements for Corporate clients (Table 2)

- As with Individuals, the Due Diligence for companies is guided by the same principles of risk and are described in Table 2

- Offshore Jurisdictions (Mauritius, Seychelles, Belize, BVI etc.) will be treated as High Risk.

Table 1- Individuals

Risk Category	Location	Primary Verifiers	Secondary Verifiers
LOW	UK only	Creditsafe online search pass	Copy of Passport ¹ or National ID card Copy of 1x address document ²
		Copy of Passport ¹ or National ID card ¹ Copy of 1x address document ²	Refer to MLRO where Primary verifiers are not available
MEDIUM	EEA only	Copy of Passport ¹ or National ID card ¹ Copy of 2x address documents ²	Please refer to MLRO where Primary verifiers are not available – other certified documents will be required. Guidance will be provided on country specifics.

	FATF only	Copy of Certified Passport ¹ or National ID card ¹ (A driving licence would not be acceptable)	
HIGH		Copy of 1 certified address document ²	Please refer to MLRO where Primary verifiers are not available – other certified documents will be required
	Others	Certified copy of Passport or National ID card ⁴ Certified copy of 2x address documents ⁵	

Notes:

PEP/Sanctions check must be undertaken via CreditSafe for each new customer relationship.

All documentation provided in a language other than English must be translated into English.

This translation must be certified (dated, signed and stamped) by the individual undertaking the translation.

i.e.

- **Notary Public**
 - **Solicitor**
- UK consulate**

*****For the avoidance of doubt. No other forms of certification from firms/persons will be accepted (e.g. Accountant/Auditor)*****

- Proof of ID. Passport is the first option and most commonly used form of ID (and/or National ID card). Details must be legible and must pass the Creditsafe Passport verification check (i.e. must include machine readable code).
- Proof of Address. Documents can include driving licence, utility bill and/or bank statement. Documents provided must be current (within 3 months of application date).
- For list of EEA and FATF countries/territories, please refer to Appendix A

Table 2- Companies

Type of Customer	Primary Verifiers	Individuals within corporate customer firm that require personal verification (see Table 1 for details)	Additional documentation required	Notes

Public Limited Company (listed on a recognised exchange)	Exchange webprint evidencing listing	None	Evidence that individuals retain appropriate corporate authorisation to undertake transactions (e.g. authorised signatory list)	→This could be evidenced by company resolution
FCA regulated institution or other firm subject to UK AML regulations or equivalent	Webprint evidencing regulatory status	None	Evidence that individuals retain appropriate corporate authorisation to undertake transactions (e.g. authorised signatory list)	Refer to MLRO to discuss status of prospective corporate customer
UK Private Limited Company	WebCheck search pass which confirms the following information: •Full name •Registered number •Registered office •Business address •Names of all Directors •Names of all individuals and/or Corporate owners who own or control over 25% of its shares or voting rights	•Directors •25% or greater individuals and/ or Corporate owners who own or control over 25% of its shares or voting rights •Ultimate beneficial owner(s) •Individuals authorised to undertake transactions	Evidence that individuals retain appropriate corporate authorisation to undertake transactions (e.g. authorised signatory list)	
Overseas Corporation	CreditSafe Offline search pass which confirms the following information: •Full name •Registered number •Registered office •Business address •Names of all Directors •Names of all individuals and/or Corporate owners who own or control over 25% of its shares or voting rights	•Directors •25% or greater individuals and/ or Corporate owners who own or control over 25% of its shares or voting rights •Ultimate beneficial owner(s) •Individuals authorised to undertake transactions	Evidence that individuals retain appropriate corporate authorisation to undertake transactions (e.g. authorised signatory list) – this will be by way of a company board resolution.	Refer to MLRO where Equifax service is unable to provide all Primary Verifiers – other certified documents will be required If this information is not verifiable by third parties, then a certification by the company's lawyer of Directors and Ultimate Beneficiary owners should be obtained.
Other entities including investment clubs, trusts & charities				Refer to MLRO

Low Risk Countries

	Notes
<u>FATF Members</u>	<p>The Financial Action Task Force (FATF) is an inter- governmental body established in 1989 by the Ministers of its Member jurisdictions. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. The FATF is therefore a “policy-making body” which works to generate the necessary political will to bring about national legislative and regulatory reforms in these areas.</p> <p>The FATF has developed a series of Recommendations that are recognised as the international standard for combating of money laundering and the financing of terrorism and proliferation of weapons of mass destruction. They form the basis for a co-ordinated response to these threats to the integrity of the financial system and help ensure a level playing field. First issued in 1990, the FATF</p>
<p>Austria, Belgium, Brazil, Canada, China, Denmark, Finland, France, Germany, Greece, Hong Kong, Iceland, India, Israel, Italy, Japan, Luxembourg, Malaysia, Mexico, Netherlands, New Zealand, Norway, Portugal, Republic of Ireland , Russia, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, Turkey, United Kingdom, United States of America</p>	<p>Recommendations were revised in 1996, 2001, 2003 and most recently in 2012 to ensure that they remain up to date and relevant, and they are intended to be of universal application.</p> <p>The FATF monitors the progress of its members in implementing necessary measures, reviews money laundering and terrorist financing techniques and counter- measures, and promotes the adoption and implementation of appropriate measures globally. In collaboration with other international stakeholders, the FATF works to identify national-level vulnerabilities with the aim of protecting the international financial system from misuse.</p> <p>The FATF's decision making body, the FATF Plenary, meets three times per year.</p> <p>The firm cannot ‘solicit’ business from Russia. Russian clients can open an account if they contact the firm without solicitation.</p> <p>The firm cannot deal with citizens of the United States of America</p>

Medium Risk Countries

APG Members	Notes
Afghanistan, Bangladesh, Bhutan, Brunei Darussalam, Cambodia, Chinese Taipei, Cook Islands, Fiji, Indonesia, Lao Peoples Democratic Republic Macao (China) Maldives Marshall Islands Mongolia Myanmar Nauru, Nepal, Niue, Pakistan Palau, Papua New Guinea Philippines, Samoa, Solomon Islands Sri Lanka Thailand, Timor Leste Tonga, Vanuatu, Vietnam	<p>The purpose of the Asia/Pacific Group on Money Laundering (APG) is to ensure the adoption, implementation and enforcement of internationally accepted anti-money laundering and counter-terrorist financing standards as set out in the FATF Forty Recommendations and FATF Eight Special Recommendations. The effort includes assisting countries and territories of the region in enacting laws to deal with the proceeds of crime, mutual legal assistance, confiscation, forfeiture and extradition; providing guidance in setting up systems for reporting and investigating suspicious transactions and helping in the establishment of financial intelligence units. The APG also enables regional factors to be taken into account in the implementation of anti-money laundering measures.</p> <p>Will be treated as 'High risk'. Monitored jurisdiction under FATF</p>
<u>CFATF Members</u>	
Anguilla, Antigua and Barbuda, Aruba Kingdom of the Netherlands, Bahamas , Barbados, Belize, Bermuda, Cayman Islands, Curacao Kingdom of the Netherlands, Dominica El Salvador Grenada Guyana Haiti Jamaica Montserrat, Saint Kitts and Nevis Saint Lucia, Saint Vincent & the Grenadines, Sint Maarten Kingdom of the Netherlands Suriname, Trinidad and Tobag , Turks and Caicos Islands Venezuela, Virgin Islands (UK)	<p>The Caribbean Financial Action Task Force (CFATF) is an organisation of states and territories of the Caribbean basin which have agreed to implement common counter- measures against money laundering. The Task Force was established as the result of two key meetings convened in Aruba in and Jamaica in the early 1990s.</p> <p>Will be treated as 'High risk'. Monitored jurisdiction under FATF</p>
<u>EAG Members</u>	
Belarus, Kazakhstan, Kyrgyzstan, Ajjikistan Turkmenistan Uzbekistan	<p>The EAG was established on 6 October 2004 in Moscow by the decision of the Inaugural Conference and at the initiative of the Russian Federation, supported by the FATF, IMF, World Bank and several other countries. The EAG is an FATF-style regional body and became an Associate Member of the FATF in June 2010.</p>

<u>ESAAMLG Members</u>	
<p>Angola Botswana Ethiopia Kenya Lesotho Madagascar Malawi Mauritius Mozambique Namibia Rwanda Seychelles, Swaziland, Tanzania Uganda Zambia Zimbabwe</p>	<p>The purpose of the Eastern and Southern Africa Anti- Money Laundering Group (ESAAMLG) is to combat money laundering by implementing the FATF Recommendations. This effort includes coordinating with other international organisations concerned with combating money laundering, studying emerging regional typologies, developing institutional and human resource capacities to deal with these issues, and co-ordinating technical assistance where necessary. ESAAMLG enables regional factors to be taken into account in the implementation of anti-money laundering measures.</p>
<u>GABAC Members</u>	
<p>Cameroon, Central African Republic Chad, Congo, Democratic Republic of the Congo Equatorial Guinea, Gabon, Bolivia Chile, Columbia Costa Rica Cuba, Dominican Republic Ecuador, Guatemala Honduras Nicaragua Panama Paraguay Peru Uruguay</p>	<p>The Task Force on Money Laundering in Central Africa (Groupe d'Action contre le blanchiment d'Argent en Afrique Centrale (GABAC)) is a body of the Economic and Monetary Community of Central Africa. It was established in 2000 and became an FATF-Style Regional body in October 2015. GABAC's associate membership has extended the reach of the FATF global network into Central Africa.</p>
<u>GAFILAT Members</u>	
<p>Bolivia Chile Columbia Costa Rica Cuba, Dominican Republic Ecuador, Guatemala Honduras Nicaragua Panama Paraguay Peru Uruguay</p>	<p>The purpose of the Financial Action Task Force of Latin America, GAFILAT, (formerly known as Financial Action Task Force of South America (GAFISUD)) is to work toward developing and implementing a comprehensive global strategy to combat money laundering and terrorist financing as set out in the FATF Recommendations. The effort includes encouraging the creation of the offence of money laundering in relation to serious crimes, the development of legal systems to effectively investigate and prosecute these offences, the establishment of systems for reporting suspicious transactions, the promotion of mutual legal assistance. GAFILAT also fosters the training of persons involved in anti-money laundering efforts. GAFILAT enables regional factors to be taken into account in the implementation of anti-money laundering measures</p>

<u>GIABA Members</u>	
<p>Benin Burkina Faso Cabo Verde Comoros Cote d'Ivoire, Gambia, Ghana Guinea Guinea Bissau Liberia, Mali Niger Nigeria, Sao Teme and Principe Senegal, Sierra Leone Togo</p>	<p>GIABA was established on 10 December 1999 by a decision of the Authority of Heads of State and government of the ECOWAS. GIABA's mandate was revised in January 2006 to fully incorporate and properly reflect the imperative to fight the financing of terrorism. Will be treated as 'High risk'. Monitored jurisdiction under FATF</p>
<u>MENAFATF Members</u>	
<p>Algeria Bahrain , Djibouti Egypt Iraq Jordan Kuwait Lebanon Libya, Mauritania Morocco Oman, Palestinian Authority Qatar, Saudi Arabia Somalia Sudan, Syria Tunisia, United Arab Emirates, Yemen</p>	<p>The objectives of MENAFATF are to:</p> <ul style="list-style-type: none"> • To adopt and implement the FATF 40 Recommendations on combating money laundering and financing of terrorism and proliferation; • To implement the relevant UN treaties and agreements and United Nations Security Council Resolutions; • To co-operate among each other to raise compliance with these standards within the MENA Region and to cooperate with other international and regional organizations, institutions and agencies to improve compliance worldwide; • To work jointly to identify issues of regional nature related to money laundering and terrorist financing, and to share relevant experiences and to develop solutions for dealing with them; and • To take measures throughout the region to effectively combat money laundering and terrorist financing in a way that does not contradict with the cultural values, constitutional frameworks and legal systems in the member countries. <p>Will be treated as 'High risk'. Monitored jurisdiction under FATF</p>
<u>MONEYVAL Members</u>	
<p>Albania Andorra Armenia Azerbaijan, Bosnia and Herzegovina Bulgaria Croatia Cyprus, Czech Republic Estonia, Former Yugoslav Republic of Macedonia Georgia, Gibraltar Guernsey, Holy Sea, Hungary Isle of Man Israel Jersey Latvia Liechtenstein Lithuania Malta Moldova Monaco, Montenegro Poland Romania San Marino, Serbia, Slovak Republic Slovenia Ukraine</p>	<p>MONEYVAL is a permanent monitoring mechanism of the Council of Europe, a pan-European organisation with 47 member states, reporting directly to its principal organ, the Committee of Ministers. MONEYVAL is entrusted with the task of assessing compliance with the principal international standards to counter money laundering and the financing of terrorism and the effectiveness of their implementation, as well as with the task of making recommendations to national authorities in respect of necessary improvements to their systems. MONEYVAL also conducts thematic typologies research of money laundering and terrorist financing methods, trends and techniques. MONEYVAL was originally an observer to the FATF and from June 2006 became an associate member.</p> <p>Will be treated as 'High risk'. Monitored jurisdiction under FATF</p>

<u>High-risk and other monitored jurisdictions</u>	
Bahamas Botswana, Democratic People's Republic of Korea (DPRK), Ethiopia Ghana Iran Pakistan Serbia Sri Lanka Syria, Trinidad and Tobago Tunisia, Yemen	On the basis of the results of the review by the International Co-operation Review Group (ICRG), the FATF identifies jurisdictions with strategic AML/CFT deficiencies in the following public documents that are issued three times a year: FATF Public Statement (call for action) and Improving Global AML/CFT Compliance: On- going Process (other monitored jurisdictions) . Call for action under FATF – THE FIRM WILL NOT DEAL WITH SANCTIONED JURISDICTIONS

Notes:

PEP/Sanctions check must be undertaken via CreditSafe for each new customer relationship.

All documentation provided in a language other than English must be translated into English.

This translation must be certified (dated, signed and stamped) by the individual undertaking the translation.

i.e.

- Notary Public
- Solicitor
- Consulate / Embassy

*****For the avoidance of doubt. No other forms of certification from firms/persons will be accepted (e.g. Accountant/Auditor)*****

- Proof of ID. Passport is the first option and most commonly used form of ID (and/or National ID card). Details must be legible and must pass the Creditsafe Passport verification check (i.e. must include machine readable code).
- Proof of Address. Documents can include driving licence, utility bill and/or bank statement. Documents provided must be current (within 3 months of application date).
- For list of EEA and FATF countries/territories, please refer to Appendix A

Appendix A

Residents of the following countries are categorised as Low Risk, Medium Risk, High Risk and Do Not Deal.