

# ANTI-MONEY LAUNDERING POLICY

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<b>Approved by:</b>	<b>Board of Directors</b>
<b>Owner(s):</b>	<b>Sonaf Business Ltd</b>
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## 1. INTRODUCTION

'Sonaf Business Ltd', is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 133, Makarios III Avenue, Classic House, 1st Floor, CY-3085 Limassol, and registered with the Registrar of Companies in Nicosia under number: HE 301937 (the "Company"). The Company is regulated as a Cyprus Investment Firm ("CIF") by the Cyprus Securities and Exchange Commission ("CySEC") under license number 174/12.

The Customer acknowledges that the Company's official language is English.

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.

## 2. ANTI-MONEY LAUNDERING PROVISIONS

Sonaf Business Ltd actively prevents any activity that promotes money laundering. These Provisions require that the Company management and other staff follow specific standards that prevent the use of their products and services for money laundering, following the Prevention and Suppression of Money Laundering and Terrorist Financing Laws Of 2007, 2010, 2012 and 2013 and Directives DI144-2007-08 of 2012, DI144-2007-08 (A&B) of 2016.

Money laundering means actions intended to conceal or mask the criminal origin of the income and exchange for money or other assets that are 'clean'.

Anti-money laundering procedures mean that the Company requests that its Customers present respective documents confirming their identity and from where the money credited to the Master Account opened with the Company to purchase specific products and services has come. If the Customer of the Company is a legal entity, then such a Customer shall provide the Company with the documents confirming its legal incorporation under the law of the country where the legal entity is a resident.

Fulfilling its obligations under these Provisions, the Company has established the following mandatory rules for all Customers:

- When crediting funds to the Master Account, the name of the sender shall fully correspond to the name indicated during the registration of the Personal Account.
- Payments from third parties are not allowed.
- Funds may be withdrawn only through the same payment method they were deposited to the Master Account.
- When transferring funds from the Customer's Trading Account or Master Account to banking accounts or to accounts in an electronic payment system, this transaction may not be performed unless the

name of the addressee corresponds in full with the name indicated in the registration form for a Personal Account at the Company.

The Company shall closely monitor suspicious actions and transactions and inform controlling bodies of such actions in a timely manner.

In compliance with the Company's requirements to check a Customer's identity the Customer shall confirm his/her name, personal data and address with legally valid documents, upon request.

When checking a Customer's identity, the Company compares the photos in the identification documents provided by the Customer.

The Company is not authorized to and is not obliged to determine whether the identity document, provided by the Customer, is legal. However, in the case that it is evident that the information obtained does not correspond to that required the Company may require that the Customer provides additional documents to establish his/her identity. In the event that the Customer refuses to provide the required information, as and when requested, or attempts to mislead Company's employees, the Company may refuse to render services to such a Customer.

If the Company finds any signs of suspicious activities that may be related to money laundering, information thereof shall be communicated to the competent bodies.

### **3. ACCOUNT OPENING DOCUMENT REQUIREMENTS**

**Photo ID** - The following are acceptable forms of photo identification:

- A valid passport
- Valid government ID, such as a Driver's License or State ID
- Valid National Identity Card

**Proof of Residence** - The following are acceptable forms of proof of residence:

- All proof of residences must be current and not older than 6 months.

We must be able to understand the language shown on your Photo ID and Proof of Residence. Please provide an English translation of your documents so that we can verify your identity.

#### **Bank Account Requirements**

All the Company's account holders **MUST** have a valid bank or credit card account in their name. The bank statement should show their name and the same registered address as their application.

#### **Funds Withdrawal Procedures**

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

The Company's customers must complete a withdrawal request containing their correct account information.

All withdrawal forms are submitted to the Company's 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.

Company's 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 the Company.

The Company will work with our Compliance department to see if further action needed and if any relevant regulatory bodies need to be contacted.

#### **4. AML POLICY DETAILS**

The Company monitors funding from various bank accounts outside of the account holder's home country.

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

The Company does not accept third-party deposits of any kind.

The Company matches each deposit to the account name on file for that customer.

The Company reserves the right to refuse processing a transaction at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, the Company is not obligated to inform the client if suspicious activity is reported to any corresponding regulatory or legal bodies.

#### **5. ACCOUNT OPENING PROCEDURES**

Prior to opening an account, the Company shall document the identity, nature of business, income, source of assets if applicable, and investment objectives of each prospective customer.

#### **6. FUNDS WITHDRAWAL PROCEDURE**

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

Sonaf Business Ltd customers must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.

The withdrawal form must be submitted to the Sonaf Business Ltd' Finance department for processing.  
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**Risk Warning:** CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage.  
Between 74-89 % of retail investor accounts lose money when trading CFDs.  
You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money.

The Finance department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and then approve the withdrawal request, pending compliance approval.

The Sonaf Business Ltd.'s Compliance department reviews all withdrawal requests approved by the Finance department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file.

The Compliance department will also examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file.

Withdrawal requests approved by the Sonaf Business Ltd.'s Compliance department are sent back to the Finance 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 Sonaf Business Ltd.'s Management.

Sonaf Business Ltd.'s Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

## **7. COMPLIANCE FOOTNOTE**

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the Sonaf Business Ltd compliance officer/team. A detailed copy of our Internal Operation Manual ("IOM") is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning Sonaf Business Ltd policies, please contact our Compliance Department. No substitutions or modifications will be accepted to the requirements above. The Sonaf Business Ltd Compliance Department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company, i.e. the Republic of Cyprus; (b) the country of origin of any funds transmitted to Sonaf Business Ltd; and (c) the destination country of any funds refunded by or withdrawn from the Company.

Sonaf Business Ltd does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

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

Our AML Policy is a policy only; it is not part of our Terms and Conditions of Business and is not intended to be contractually binding.

## **8. MONITOR AND REVIEW**

The Company will, on a regular basis, monitor and assess the effectiveness of this Policy in order to deliver the best possible service for the Client, and, where appropriate, the Company reserves the right to correct any deficiencies in this Policy and make improvements to it.

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In addition, the Company will review the Policy at least annually. A review will also be carried out whenever a material change occurs that affects the ability of the Company to continue to provide the best possible investment services to its Client.

## **9. CLIENT CONSENT**

The Company is required, when establishing a business relationship with the Customer, to obtain his/her prior consent to this Policy.

