

AML / CTF Policy

METAGOLD LLC (the “**Company**”) is committed to the highest standards of compliance against money laundering (AML) and anti-terrorist financing (CTF). The objective of the Company’s Policy against Money Laundering and Terrorism Financing is to actively prevent the risks of these matters. To help the government combat the financing of terrorism and money laundering activities, the law requires all legally obliged institutions to obtain, verify, and record information that identifies each person who opens a trading account. We have an obligation to report suspicious clients’ activity related to money laundering or terrorism financing, to an appropriate authority.

Money Laundering: The process of converting funds received from illegal activities (such as fraud, corruption, terrorism, tax evasion etc.) into other funds or investments that appear legitimate to hide or distort the actual source of funds.

Terrorist financing: The offense committed by any person who, by any means, directly or indirectly, unlawfully and willfully provides or collects funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out acts intended to cause death or serious bodily injury to civilians or non-combatants.

The money laundering process can be divided into three sequential stages:

- **Placement.** At this stage, the funds are turned into financial instruments, such as checks, bank accounts, and money transfers, or they can be used to buy high-value goods that can be resold. They can also be physically deposited in banks and non-bank institutions (eg exchange houses). To avoid suspicion on the part of the company, the bleach can also make several deposits instead of depositing the entire sum at once, this form of placement is called smurf.
- **Layers.** The funds are transferred or moved to other accounts and other financial instruments. It is done to disguise the origin and interrupt the indication of the entity that carried out the multiple financial transactions. Moving funds and changing their form makes it difficult to track the money that is being laundered.
- **Integration.** The funds are re-circulated as legitimate to purchase goods and services .

The Company is committed to be in compliance with all applicable laws and regulations regarding anti-money laundering and terrorist financing in the jurisdiction where it is registered, international practice and standards. The Company adheres to the principles of AML and CTF, and actively prevents any action that targets or facilitates the legalization process of illegally obtained funds .

The Company’s AML and CTF policy aims to prevent the use of its services by criminals for money laundering, terrorist financing or any other criminal activities .

To prevent money laundering, the Company does not accept or pay in cash under any circumstances. The Company reserves the right to suspend the operations of any client, which may be considered illegal or, in the opinion of the Company, related to money laundering, terrorist financing.

Company procedures

Proper AML/CTF measures and processes are designed and implemented by the Company. So, the Company:

- Identifies and verifies each client, its representatives, beneficial owners, performs proper due diligence;
- Implements appropriate internal controls, ongoing monitoring of clients, their transactions;
- Maintains record keeping in accordance with applicable laws and regulations;
- Keeps proper records;
- Implements other processes and measures as required by the applicable AML/CTF regulations.

Know Your Customer – Due to the Company’s commitment to AML and KYC policies, each Company’s client must complete an identification and verification procedure. Before the Company initiates any cooperation with the client, it ensures that satisfactory evidence is presented or other measures are taken that produce satisfactory proof of the identity of any client, its representatives, beneficial owners. The Company applies enhanced due diligence for clients, being residents of countries, identified by credible sources as countries, as having inadequate AML/CTF standards, or who may pose a high risk of crime and corruption, and where beneficial owners of such clients reside in and whose funds are sourced from named countries.

Individual clients

During the registration process, each client provides personal information, specifically :

- full name ;
- birthdate ;
- confirmation of country of origin ;
- full residential address,
- other identity information as required by the Company .

The following documents are required to verify personal information :

A client submits the following documents (in case the documents are written in non-Latin characters: to avoid delays in the verification process, it is necessary to provide a notarized translation of the document in English) due to KYC requirements and to confirm the indicated information:

- Valid passport (showing the first page of the local or international passport, where the photo and signature, other information are clearly visible); or
- Driving license with photograph; or
- National identity card (showing the front and back);
- Documents proving current permanent address (such as utility bills, bank statements, etc.) containing the client's full name and place of residence. These documents should not be older than 3 months from the filing date.

Corporate clients

In the event that a corporate client is listed on a recognized or approved stock exchange or when there is independent evidence to show that the corporate client is a wholly owned subsidiary or a subsidiary under the control of said company, no further steps will normally be taken to verify the identity of beneficial owners, and simplified due diligence is implemented. In the event that a corporate client is not listed and none of the main directors or shareholders already has a trading account with the Company, the following documentation must be provided:

- Certificate of incorporation or any national equivalent;
- Memorandum and Articles of Association and statutory declaration or any national equivalent;
- Certificate of good standing or other proof of the corporate client's registered address;
- Resolution of the board of directors to open a trading account (if required by the foundation documents) and grant authority to those who will operate it;
- Copies of powers of attorney or other authorities granted by the directors in relation to the corporate client;
- Proof of the identity of the directors in case they deal with the Company on behalf of the corporate client (in accordance with the individual identity verification rules described above);
- Proof of identity of the final beneficiary (s) and / or the person (s) under whose instructions the signers of the account are empowered to act (in accordance with the rules of individual identity verification described above).

If a client's identification information changes or if their activities raise suspicion, the Company reserves the right to request updated documentation, even if previous verification has been completed.

PEPs, Sanctions lists

The Company determines if the client, beneficial owner, director of the corporate client is a politically exposed person ("PEP"), a close associate of a PEP, or a PEP's family member. Any relationship with a PEP is automatically considered high-risk.

The Company is responsible for ensuring that it does not conduct business with individuals or entities subject to sanctions laws. To fulfill this responsibility, the Company implements screening procedures for all clients against applicable sanctions lists.

Tracking client's activity, transactions monitoring

In addition to collecting client information, the Company continues to monitor the activity of each client to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is not consistent with the legitimate business of the client or with the transaction history of the regular client known by tracking client activity. The Company has implemented proper transactions monitoring processes (both automatic and, if necessary, manual) to prevent criminals from using the Company's services.

Ongoing monitoring of the clients' activities by the Company includes :

- Identifying suspicious activity through regular ongoing transactions monitoring;
- Conducting enhanced due diligence when necessary to assess potential risks.

Ongoing transactions monitoring of client relationships involves:

- Reviewing transactions within the business relationship to confirm they align with the Company's understanding of the client, the nature and scope of their business;
- Verifying the source of funds, source of wealth, and assets under the client's control, when circumstances justify such investigation;
- Ensuring that all documents, data, or information related to the business relationship are current and accurate, duly recorded.

Registry maintenance

Records must be kept of all transaction data and data obtained for identification purposes, as well as all documents related to money laundering issues (e.g., suspicious activity reporting files, AML account monitoring documentation, etc.) .

The Company maintains up-to-date records, ensuring that all documents, data, or information collected during the client due diligence process remain updated and relevant.

Those records are kept for a minimum of 7 years after the trading account is closed.

Measures taken

In cases of an attempt to execute transactions that the Company suspects are related to money laundering or other criminal activity, it will proceed in accordance with applicable law and report the suspicious activity to the regulatory authority .

The Company reserves the right to suspend the operation of any client, which may be considered illegal or may be related to money laundering in the opinion of the Company.

The Company has full discretion to temporarily block the suspicious client's account or terminate a relationship with an existing client. For more information you can contact us at Support@fxmetagold.com.