



AML & KYC Policy

V.3 Aug 2019

1. Anti-money laundering (AML) policy

ICC Intercertus Capital (Cayman) Ltd (hereinafter called as the “Company” or “EverFX” or “we” or “our” or “us”) is an Investment Firm incorporated and registered under the laws of Cayman Islands, with registration number 326096. The Company is authorised and regulated by the Cayman Islands Monetary Authority (hereinafter called as “CIMA”) under the license number 1444866. EverFX is a trade name of the Company.

The Company is working hard to create a culture that helps detect and report any incidences of money laundering and/or terrorist financing. The company is committed to be in compliance with all applicable laws and regulations regarding anti money laundering and terrorist financing in the Cayman Islands.

2. Money Laundering and Terrorist Financing

It is our major responsibility, among others, to prevent money laundering and terrorist financing. On one hand, the money laundering is a financial crime committed by someone who is making the possession, use or disposal of money or other property obtained from criminal activities appear to be legal. On the other hand, terrorist financing is the process by which terrorists fund their operations in order to perform terrorist acts. Terrorists need financial support to carry out their activities and to achieve their goals. There is little difference between terrorists and other criminals in their abuse of the financial system. While different from money laundering, terrorists often exploit similar weaknesses in the financial system.

The Anti Money Laundering Compliance Program is designed to prevent the firm from forming business relationships or from carrying out one-off transactions with or for another person or client unless the firm can:

- a. Clearly establish the identity of the person or client;
- b. Maintain record keeping procedures in accordance with applicable laws and regulations; and
- c. Apply appropriate internal controls and communication.

The Company has put in place a robust governance framework throughout the organisation for managing risk and AML compliance.

The Company’s AML governance framework is made up of the following core components;

- a. Responsible Board oversight;

- b. A strong and independent Money Laundering Compliance Officer (MLCO);
- c. Adoption of the risk based approach as per the Cayman AML regulations and laws, as amended from time to time;
- d. Policies and Procedures; and
- e. Ongoing organisation wide Training.

Due Diligence Procedures:

- a. Identify a customer, whether a customer in an established business relationship or a one-off transaction, and whether natural, legal person or legal arrangement and shall verify the customer's identity using reliable, independent source documents, data or information;
- b. Verify that a person purporting to act on behalf of a customer is properly authorised and identify and verify the identity of the person;
- c. Identify a beneficial owner and take reasonable measures to verify the identity of the beneficial owner, using the relevant information or data obtained from reliable sources, so as to be satisfied that the person knows the identity of the beneficial owner;
- d. Understand and obtain information on, the purpose and intended nature of a business relationship; and
- e. Conduct ongoing due diligence on a business relationship including -
 - i. Scrutinising transactions undertaken throughout the course of the business relationship to ensure that transactions being conducted are consistent with the person's knowledge of the customer, the customer's business and risk profile, including where necessary, the customer's source of funds; and
 - ii. Ensuring that documents, data or information collected under the customer due diligence process is kept current and relevant to customer due diligence, by reviewing existing records at appropriate times, taking into account whether and when customer due diligence measures have been previously undertaken, particularly for higher risk categories of customers.

For the purposes of clients' verification, the following document might be required:

Personal Accounts	Corporate Accounts
<ul style="list-style-type: none"> • Proof of Identity: this can be a Passport or a National Identity card or a Driving license. Please ensure that document is valid and provided copy is clearly readable. • Proof of address: this can be a utility bill (water, electricity, gas, internet, landline), bank statement, residence certification, tax return documentation or a recent payslip. Please ensure that document is in your name and contains your full address. Note that document cannot be older than 6 months. 	<ul style="list-style-type: none"> • Certificate of Incorporation • Certificate of Director(s) and Secretary • Certificate of Registered Office • Certificate of Beneficiary Owner(s)/Shares certificate • Certificate of Incumbency/Good Standing • Memorandum & Articles of Association of the Company • The Company's latest audited financial statements or the Company's latest management accounts or a Trial Balance signed by the company's accountants & director(s) or any other documentation which indicates the current financial situation of the Company • Proof of identity and proof of current home address of every Shareholder that has 10% or more shares • A resolution by the Board of Directors of the Company for the opening of a trading account with EverFX and to whom they grant

	<p>authority to operate the trading account</p> <ul style="list-style-type: none"> • Full KYC documentation of the person who will operate the trading account and at least one Director of the Company. Specifically: <ol style="list-style-type: none"> 1. Proof of Identity – this can be a copy of your international Passport or Identity Card and Driver’s license. Please provide front and back side of the document. Note that document must be valid and provided copy must be in color and clearly readable. 2. Proof of Address – this can be an official documentation of your utility bill (gas, water, electricity or landline/ internet), bank / card statement, residence certificate on income tax bill showing your name, address and issue date. Note that the document cannot be older than 6 months. <p>*Important*The Company’s documentation must be recent and original or certified as true copies of the original.</p> <p>In addition, corporate account application form is required to be filled.</p>
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The Company follows the domestic legislation as required by CIMA, however we do follow stricter rules and legislation when it comes to AML procedures and will continue to keep in place the AML procedures in order to safeguard and act honestly, fairly always acting in the best interest of the clients.

The Company also has a policy of processing withdrawals only to the same bank accounts as initial deposits.

3. Confidentiality

The personal data we receive is handled in accordance with the provisions of the Privacy Agreement. Please note that the reason for the identification procedure is to comply with laws against money laundering and financing terrorism, not because we suspect you of committing illegal acts. Accordingly, your cooperation and understanding of these steps is necessary to effectively combat money laundering and financing terrorism.

Each of the affiliates of the Company is required to comply with AML and KYC policies.

All identification documents and services records shall be kept for the minimum period of time required by the law.

All new employees shall receive anti money laundering training as part of the mandatory new-hire training program. All applicable employees are also required to complete AML and KYC training annually. Participation in additional targeted training programs is required for all employees with day-to-day AML and KYC responsibilities.

This policy is intended for the protection of the Company and our clients. If you have any questions about the policy, please contact support@everfxglobal.com



E: support@everfxglobal.com | W: www.everfxglobal.com

P: +13457695571, +380893240717

EverFX is a trade name of ICC Intercertus Capital (Cayman) Ltd, whose registered address at Artemis House, Fort Street, KY1-1111, Grand Cayman, Cayman Islands and with registration number 326096. ICC Intercertus Capital (Cayman) Ltd is authorised and regulated by the Cayman Islands Monetary Authority (CIMA) with license number 1444866.