



AML & KYC Policy

V.3 August 2019

ICC Intercertus Capital 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 the Republic of Cyprus, with registration number HE 346662. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 301/16. EverFX is a trade name of the Company.

EverFX is active in working to prevent money laundering. The company follows CySEC's regulations and all relevant laws in its policies for anti-money laundering and terrorist financing, with particular attention paid to the following:

- The Prevention and Suppression of Money Laundering Activities Laws of 2007-2018, as amended (hereinafter called as the “Law”)
- Directives issued by CySEC, particularly Directive 144-2007-08 on the Prevention of Money Laundering and Terrorist Financing
- All of the relevant EU's directives on preventing the financial system being used to launder money and/or finance terrorists

1. 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.

2. How we prevent Money Laundering and Terrorist Financing

Detecting and reporting terrorist financing red flags is the most effective way to combat terrorist financing and stop the flow of funds.

Pursuant to the relevant Law, Regulations, Directives and Circulars of CySEC, we must uphold our duty to maintain and improve our systems, controls and procedures for the prevention of money laundering and financing. Therefore, we have the following best practice standards:

- a) all clients must submit valid identification documents;

- b) records of clients' identification documents are maintained by EverFX, for a period as this is set out by CySEC;
- c) all clients are checked against lists of known or suspected terrorists;
- d) clients are notified that their information will be used to verify their identity;
- e) ongoing monitoring of transactions and accounts;
- f) always return deposited funds to the clients by way of the same bank account from which they originated and always in the same name of the client;
- g) no cash payments are allowed and/or approved by EverFX;

3. 'Know your client' (hereinafter referred to as "KYC")

KYC policy plays an important role in preventing identity theft, money laundering, terrorist financing and other types of fraud.

We take every step possible to prevent fraud. This means that we work to ensure the security of all sensitive data with various measures and controls. To be certain that electronic transactions are secure, we require certain information and documents from our clients. Upon the establishment of a business relationship with the Company, the client will be required to provide the below:

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 authority to operate the trading account
- Full KYC documentation of the person who will operate the trading account and at least one Director of the Company. Specifically:

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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Credit/debit card

If funding with a credit or debit card, a client should send us a copy of both sides of their card. The copy needs to have the name, date of expiry, last four digits on the front and signature on the back clearly visible. We need this to be certain that all transfers are made only to and from your card.

For your security, we advise you to cover the card number except for the last four digits and the CVV code on the back.

Bank wire confirmation

If a client deposits with bank wire, we need to see the confirmation.

If you have any questions about these documents, please contact support@everfx.eu.

Documents should be provided as soon as possible so that we can avoid any delays to your transactions. KYC documents should be scanned or photographed with all edges visible and sent to support@everfx.eu.

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 local 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.

Further information is available upon request.

The Company's contact details are:

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e-mail: compliance@everfx.com

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