

Compliance

Anti-Money Laundering & Counter Terrorism Financing Policy



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1. Introduction

GO Markets International Ltd is committed to the highest standards of Anti-Money Laundering and Counter Terrorism Financing (“AML/CTF”). The primary purpose of this AML/CTF Compliance Manual is to identify, mitigate and manage the risk that the Company may reasonably face (inadvertently or otherwise) by facilitating money laundering or terrorism financing through the provision of its designated services.

Money Laundering is a process intended to mask the benefits derived from serious offenses or criminal conduct.

Generally, the process of money laundering comprises three stages:

- A. Placement - the physical disposal of cash proceeds derived from illegal activity.
- B. Layering - separating illicit proceeds from their source by creating complex layers of financial transactions
- C. Integration - the provision of apparent legitimacy to criminally derived wealth.

2. Customer Identification and Verification

GO Markets International Ltd have different customer identification and verification procedures for different customer types and risk ratings GO’s customers include the following:

- Individuals
Company requires a government issued document (such as a passport, ID card or drivers’ licence), along with a utility bill, bank statement or other official document to verify their address. Proof of address documents must be the entire statement; extracts just showing the address are not acceptable.
- Company
Depending on the information obtained or the nature of the customer, additional information and/or verification may be required.
 - (a) our customer types, including beneficial owners of customers and any Politically Exposed Persons (domestic, international organisation and foreign).
 - (b) the source of funds and wealth of our customers.
 - (c) the nature and purpose of the business relationship with our customers.
 - (d) control structures of non-individual customers, and the beneficial owners of our customers.
 - (e) the types of designated services we provide.
 - (f) the methods by which we deliver our designated services.
 - (g) the foreign jurisdictions with which we deal.

3. Monitoring of customer activity

The company monitors suspicious and revenue-intensive transactions closely, takes timely, appropriate actions on said transactions and informs the appropriate bodies without undue delay. We have adopted a regulatory and legally compliant process for suspicious activity reporting.

4. Deposit and Withdrawal Requirements

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

- Our customers must complete a withdrawal request containing their correct account information.
- All withdrawal forms are submitted to our 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.
- Our 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 our compliance department.
- Our Management would work with the Compliance department to see if further action needed and if any relevant regulatory bodies need to be contacted.

5. Record Keeping

All data obtained according to client identification and AML security measures must be documented. Records must be kept for a minimum of 7 years, notwithstanding potentially longer retention periods under local civil or commercial law.