



**Anti-Money Laundering and
Counter-Terrorist Financing
Policy**

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1. Introduction

This Anti-Money Laundering and Counter-Terrorist Financing Policy (“AML Policy”) sets out the procedures and controls implemented by JT Markets Limited (the “Company”) to prevent the use of its services for money laundering, terrorist financing, or any other financial crime.

The Company is incorporated in the Republic of Seychelles and operates in accordance with applicable legislation including:

- Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020
- Financial Intelligence Unit Act, 2006
- Securities Act, 2007 (as amended)
- Financial Services Authority (FSA) Regulations and Guidelines

The Company is committed to maintaining the highest standards of compliance and ensuring that its services are not used to facilitate financial crime.

2. AML Principles

The Company maintains policies and procedures designed to:

- Identify and verify the identity of clients and beneficial owners
- Monitor transactions for suspicious activity
- Report suspicious transactions to the Financial Intelligence Unit (FIU)
- Maintain appropriate records
- Provide AML training to staff
- Implement internal controls to manage financial crime risk

The Company will not knowingly establish or maintain a business relationship with any individual or entity involved in criminal activity, terrorism financing, or sanctioned activity.

3. Know Your Customer (KYC)

Prior to establishing a business relationship, the Company must identify and verify the identity of its clients.

3.1 Individual Clients

Clients must provide:

Proof of Identity (one of the following):

- Valid passport
- National identity card
- Driver's licence
- Government issued identification

Proof of Address:

- Utility bill
- Bank statement
- Government issued document confirming residence

Proof of address must be dated within the previous six months.

3.2 Corporate Clients

For corporate clients the Company must obtain:

- Certificate of Incorporation
- Memorandum and Articles of Association
- Register of Directors
- Register of Shareholders
- Certificate of Good Standing (if applicable)
- Identification documents for all directors and beneficial owners

The Company must identify Ultimate Beneficial Owners (UBOs) holding 25% or more ownership or control.

4. Risk Based Approach

The Company applies a risk-based approach to AML compliance.

Clients are assessed based on factors including:

- Country of residence or incorporation
- Nature of business activity
- Source of funds
- Transaction behaviour
- Regulatory status

Clients may be classified as:

- Low Risk
- Medium Risk
- High Risk

Enhanced Due Diligence (“EDD”) is required for higher risk clients.

5. Politically Exposed Persons (PEPs)

Where a client is identified as a **Politically Exposed Person (PEP)**, the Company will apply enhanced due diligence measures including:

- Senior management approval prior to onboarding
- Verification of source of wealth and source of funds
- Enhanced transaction monitoring

6. Sanctions and Screening

All clients must be screened against applicable sanctions lists including:

- United Nations Sanctions Lists
- EU Sanctions Lists
- UK Sanctions Lists
- Other international sanctions databases

The Company will not enter or maintain a business relationship with any sanctioned individual or entity.

7. Transaction Monitoring

The Company monitors client transactions to identify unusual or suspicious activity.

Indicators may include:

- Unusual deposit or withdrawal patterns
- Transactions inconsistent with a client’s profile
- Rapid movement of funds through accounts
- Activity involving high risk jurisdictions

Where suspicious activity is detected, the matter must be escalated to the AML Compliance Officer.

8. Suspicious Transaction Reporting

If the Company suspects that funds are related to criminal activity, money laundering, or terrorist financing, a Suspicious Transaction Report (STR) will be submitted to the Financial Intelligence Unit (FIU) of Seychelles.

Employees must not disclose to the client that a report has been filed.

9. Source of Funds

The Company must obtain information regarding the **source of funds and source of wealth** of clients where appropriate.

Examples include:

- Salary or employment income
- Business profits
- Investment income
- Sale of assets
- Inheritance

The Company reserves the right to request supporting documentation.

10. Deposits and Withdrawals

The Company implements strict controls regarding client funds.

- Deposits must originate from accounts in the client's name
- Third-party deposits are generally not accepted
- Withdrawals will be returned to the original funding source where possible
- Transactions may be delayed where AML checks are required

The Company reserves the right to refuse any transaction suspected to be linked to financial crime.

11. Record Keeping

All records relating to client identification, transactions and AML investigations must be retained for a minimum of:

Seven (7) years after the termination of the business relationship.

Records must be available for inspection by regulatory authorities upon request.

12. AML Compliance Officer

The Company appoints an Anti-Money Laundering Compliance Officer (AMLCO) responsible for:

- Monitoring AML compliance
- Reviewing suspicious transactions
- Reporting to the Financial Intelligence Unit
- Maintaining AML policies and procedures
- Providing staff training

The AMLCO reports directly to senior management.

13. Staff Training

All relevant employees must receive AML training covering:

- AML laws and regulations
- Identification of suspicious transactions
- Internal reporting procedures
- Financial crime typologies

Training is conducted on a regular and ongoing basis.

14. Policy Review

This AML Policy will be reviewed periodically and updated as necessary to ensure compliance with:

Seychelles legislation

Financial Services Authority requirements

International AML standards