

## **Anti-Money Laundering Policy AML POLICY**

### **1. Introduction**

Eska Markets is committed to maintaining the integrity of the global financial system by preventing money laundering, terrorism financing, fraud, and other illicit activities. This Anti-Money Laundering (AML) Policy outlines the internal procedures, responsibilities, and standards adopted by the Company in compliance with applicable legal and regulatory requirements.

1.1 Definition “Money laundering” refers to activities aimed at concealing the origin of proceeds from criminal conduct to make them appear legitimate. “Terrorist financing” involves collecting or providing funds to support terrorist activities.

1.2 Objectives • Detect and prevent suspicious financial activity • Implement risk-based customer due diligence • Comply with international and local AML/CTF obligations • Promote transparency and a secure trading environment

### **2. Customer Due Diligence (CDD)**

2.1 Individual Clients Before establishing a business relationship, we collect and verify:

- Full name, date of birth, nationality
- Government-issued ID (passport, national ID, driver’s license)
- Residential address proof (utility bill, bank statement, tax bill – issued within 3 months)
- Contact details: email and phone number

#### **2.2 Corporate Clients**

- Company name, registration number, incorporation date
- Country of incorporation and business address
- Certificate of Incorporation, Articles of Association, and other incorporation documents
- List of directors, beneficial owners, and authorized representatives
- Contact information and nature of business

**2.3 Document Verification** The verification process takes up to 4 business days after receipt of all required documents. If documents are unclear or missing, the Company may request resubmission.

**2.4 Address Verification** Acceptable documents include:

- Utility bill (water, electric, landline phone)
- Bank statement
- Government-issued document

**2.5 Card Deposits** When depositing via credit/debit card, the client must provide an image showing:

- Front: Name, expiry date, first six and last four digits (middle digits masked)
- Back: Signature (CVV/CVC code must be hidden)

### **3. Enhanced Due Diligence (EDD)**

EDD applies in the following scenarios:

- Politically Exposed Persons (PEPs)
- High-risk jurisdictions (as per FATF or local guidance)
- Complex ownership structures
- Large or inconsistent transactions

EDD Measures:

- Request proof of source of funds and/or wealth (bank statements, salary slips, contracts)
- Additional identity verification
- Ongoing scrutiny of client behavior

#### **4. Ongoing Monitoring**

- Continuous monitoring of transaction patterns
- Regular updates of client information
- Identifying and investigating unusual or suspicious behavior

#### **5. Payment and Withdrawal Policy**

- Eska Markets only processes deposits/withdrawals from accounts in the same name as the client
- No third-party payments or withdrawals allowed
- Funds must be withdrawn using the same method and currency used for deposit

#### **6. Record Keeping**

All records related to client identity, transactions, and due diligence are securely maintained for a minimum of 5 years after the termination of the business relationship.

#### **7. Sanctions and Restricted Jurisdictions**

We do not provide services to clients from jurisdictions that:

- Are under international sanctions (UN, EU, OFAC, etc.)
- Are listed by FATF as high-risk
- Include: USA, North Korea, Iran, Russia, Belarus, Vietnam, among others

#### **8. AML Compliance Structure**

##### **8.1 AML Compliance Officer (AMLCO)**

- Reports directly to senior management
- Oversees AML risk assessment and internal audits
- Ensures regulatory reporting and timely filing of Suspicious Activity Reports (SARs) • Trains staff and maintains AML policy updates

## 8.2 Internal Reporting

- Staff must report suspicious activity to AMLCO promptly
- AMLCO evaluates and determines SAR filing with the Financial Intelligence Unit (FIU)
- Tipping off clients under investigation is strictly prohibited

## 9. Staff Training and Oversight

- All employees receive AML training upon onboarding and at least annually
- Training includes identifying suspicious behavior, reporting procedures, red flags, and legal consequences
- Regular tests, scenarios, and real-case reviews included in training modules
- New hires in sensitive roles undergo background checks

## 10. Risk-Based Approach (RBA) Clients are classified as:

- Low Risk • Medium Risk
- High Risk Control measures and monitoring intensity vary by risk level. Clients from high-risk categories undergo EDD.

## 11. Suspicious Activity Reporting (SAR)

- Staff must report any suspicious transaction to AMLCO immediately
- AMLCO files SARs where appropriate and keeps detailed records
- All SARs are handled confidentially

## **12. Payments Policy**

- Deposits must come from verified accounts belonging to the client
- Withdrawals must go back to the same account used for deposit
- Currency consistency is required between deposit and withdrawal
- No conversion or rerouting to unrelated payment methods

## **13. Employee Responsibilities and Code of Conduct**

- Familiarity with this AML Policy is mandatory for all staff
- Breaches may result in termination or legal action
- Staff must act ethically and uphold AML standards at all times

## **14. Internal Audits and Reviews**

- Annual internal audits are conducted to test the AML program
- Policies are reviewed and updated as needed, or at least once per year

15. Contact for AML Enquiries Email: **support@eska-markets.com**

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