



**AT Global Markets (Australia) (Pty) Ltd.
Anti-Money Laundering Policy**

Governance	
Version	V2.0
Approved by	Compliance
Policy Owner	Compliance
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Introduction

Money laundering is the process of concealing the criminal origin of money or other assets, so they appear to come from a legitimate source. It is illegal, unethical and facilitates criminal conduct. Failure to address the risk of money laundering can undermine reputation and lead to investigations, fines and other penalties for the company and/or individuals.

Since, AT Global Markets (Australia) (Pty) Ltd (ATFX (Australia) provides designated services to retail and wholesale clients, it is required to comply with the Anti-Money Laundering/ Counter Terrorism Financing (AML/CTF) Act 2006 and its related rules and is a reporting entity under the Anti Money Laundering regulator, Australian Transaction Reports and Analysis Centre (AUSTRAC). ATFX (Australia) by complying with all applicable rules and regulations seeks to prevent money laundering and appropriately manage the money laundering risk that it faces. ATFX (Australia) takes a risk-based approach to assessing its risks and in implementing preventative controls to manage money laundering risk.

The Purpose

The purpose of this policy is to protect ATFX (Australia) 's clients, its employees and its reputation from being exposed to significant Anti-Money laundering risks. This policy seeks :-

- 1) to protect the integrity of the ATFX (Australia).
- 2) to meet our legal obligations.
- 3) to outline how we manage our Anti-Money Laundering risks.
- 4) to prevent the use of the ATFX (Australia)'s services by criminals, with the aim of money laundering, terrorist financing or other criminal activity.

Company Procedures

ATFX (Australia) will make sure that it is dealing with a verified individual or company. We perform all measures under the AML/CTF Act to ensure that we perform the following:-

- know your customer (KYC) procedures and due diligence (DD) on customers.
- monitoring of customer activity.
- record keeping.

Know your customer and due diligence

Due to the company's commitment to AML and KYC policies, each client of the company has to complete a verification procedure. Before we start providing any service to a client, the company ensures that satisfactory evidence is produced or such other measures that will produce satisfactory evidence of the identity and existence of any customer or counterparty are taken. The company as well applies heightened scrutiny to clients who are residents of countries that are designated high risk for sanctions and money laundering and who have inadequate AML standards.

Individual Clients

During the process of registration, each client provides suitable documents to verify their full name, date of birth, country of origin and complete residential address. These would be current valid passports, drivers licences, national identity cards and documents proving current permanent address such as utility bills and bank statements. Once all these are verified ATFX (Australia) will onboard the client. We have a customer risk assessment calculator that takes into account various factors including country of citizenship. From the results of this customer risk assessment, we obtain a low, medium and high risk assessment for all our client applications. For each risk assessment we obtain documents according to our document requirements specified in our Anti-Money Laundering Program Part B.

Corporate clients

If the company is listed on a recognised or approved stock exchange or where there is independent evidence to show that the applicant is a wholly owned subsidiary or a subsidiary under the control of such a company, no further steps to verify identity will normally be required. For unlisted foreign or domestic companies, we need a Certificate of incorporation or equivalent, Memorandum and Articles of Association and statutory statement or any national equivalent, proof of registered address of the company. We also need a listing of Directors, and we need to KYC all beneficial owners who hold 25% or more of the shares of the company. Once we have all the required documents we onboard the company. Corporate clients also have a customer risk assessment calculated and document requirements per risk assessment specified in our Anti-Money Laundering Program Part B.

Monitoring of Client Activity

In addition to gathering identity and residential information from the clients, ATFX (Australia) continues to monitor the activity of every client to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is inconsistent with the client's legitimate business or the usual client's transaction history known from client activity monitoring. ATFX (Australia) has implemented the system of monitoring of suspicious transactions to prevent the company's services being used by criminals.

Record Keeping

Records must be kept of all transaction data and data obtained for the purpose of identification, as well as all documents related to money laundering such as all the transaction monitoring that is undertaken. These records are kept for a minimum of 7 years after the account is closed.

Deposits and Withdrawal Requirements

All deposits and withdrawals with ATFX (Australia) are subject to strict requirements.

- ATFX (Australia) does not accept cash deposits from clients.
- The AML/CTF Act prevents ATFX (Australia) from receiving or depositing funds to third parties.
- Funds sent to ATFX (Australia) must be from a bank account, Credit/Debit Card or approved Alternative Payment method (e.g. Skrill/Neteller).
- When funds are returned to you, we return first to your funding source and then to a verified payment method of your choice.

Measures Taken

In cases of an attempt by a client to execute transactions which ATFX (Australia) suspects that are related to money laundering or other criminal activity, it will proceed in accordance with applicable law and report suspicious activity to AUSTRAC. ATFX (Australia) reserves the right to suspend any client's account if it suspects money laundering or terrorism financing transaction activity. Where it is confirmed that such activity has taken place, then the client relationship may be terminated.

Summary

By implementing and following the above procedures, on a risk assessment basis we are comfortable that we comply with the AML/CTF Act in preventing money laundering and terrorism financing. If you have any questions on our AML process please contact compliance@atfx.au