



ANTI MONEY LAYNDERING POLICY

Introduction

Any reference to "TagorTrade," the "Company," "we," "us," or "our" refers to Tagor Trade Ltd, a company incorporated in the United Kingdom with Registration Number: 09133368. This AML & KYC Statement outlines how TagorTrade complies with its Anti-Money Laundering ("AML") and Countering Terrorism Financing ("CTF") responsibilities under applicable international law.

1. AML & KYC Statement

TagorTrade operates in multiple jurisdictions, each with differing Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) requirements. This public statement details our approach to AML and CTF and the common practices we apply as part of our commitment to detect and prevent various types of financial crimes related to our products and services. Therefore, our policies, procedures, and controls for preventing money laundering and terrorism financing comply with international AML/CTF laws and regulations, as well as industry standards and practices. The AML/CTF policies and procedures apply to all officers, employees, and affiliated entities of TagorTrade.

2. Risk Management Approach

To enhance our risk management approach, TagorTrade has implemented a Compliance function responsible for developing programs and policies to prevent money laundering and terrorism financing. This approach involves several steps to assess the most appropriate ways to manage and mitigate the money laundering ("ML") and terrorism financing ("TF") risks faced by TagorTrade. These policies include provisions regarding:

- Customer Due Diligence ("CDD") on certain categories of clients and when deemed necessary by the Compliance Department.

- Enhanced Due Diligence based on each client's risk profile.

- Transaction Monitoring, including the restriction of suspicious transactions.

- Suspicious Transaction Reporting, depending on the applicable jurisdiction(s).

- Oversight of third-party affiliates, business introducers, and other outsourced functions.

- Targeted AML/CTF training for our officers and employees.

- Sanctions Compliance Program, including screenings.

- Internal policies prohibiting the provision of services to certain jurisdictions and/or specific types of clients.

TagorTrade adopts a risk-based approach in designing its internal policies and procedures for assessing and effectively managing the risk of its services being used for ML and TF purposes.

3. Due Diligence / Monitoring Procedures

TagorTrade applies client identification procedures and other client due diligence measures in the following cases:

When a withdrawal request exceeds the internal threshold.

When there are indications of potential market abuse and/or attempted market manipulation.

When there is suspicion of money laundering or terrorist financing, regardless of the transaction amount.

When there are doubts about the veracity or adequacy of client identification data.

The identification procedures and customer due diligence measures include, but are not limited to, identifying the client and verifying the client's identity using documents. Depending on the case, this may involve obtaining information on the purpose and intended nature of the business relationship, residential address, and source of funds.

TagorTrade also examines, as far as reasonably possible, the background and purpose of all complex and unusually large transactions and unusual patterns of transactions with no apparent economic or lawful purpose. In particular, the degree and nature of monitoring the business relationship shall be increased to determine whether those transactions or activities appear suspicious.

4. Timing & Verification

The timing and verification of clients' identification documents are completed during the business relationship when necessary, to avoid interrupting the normal conduct of business where there is little risk of money laundering or terrorist financing. When TagorTrade initiates the identification and verification procedures, clients are notified immediately via email. Thereafter, the cumulative time allowed for clients to complete verification and due diligence should not exceed 20 days from the initial notification date.

5. Applicable KYC Documents

Applicable KYC documentation for natural persons includes:

Identification (Valid, not expired): Passport, ID, or Driving License.

Proof of Address (Recent, dated within 6 months): Utility Bill, Landline Bill, Rental Agreement, Bank Statement, Tax Bill, or any other equivalent document.

Source of Funds: Bank or Trading Account Statement, Tax Declaration, Payslip, or any other document supporting the source of income.

Applicable KYC documentation for legal entities includes:

Statutory Documents: Corporate certificates of legal existence, directors, and beneficial owners.

Identification (Valid, not expired): Passport, ID, or Driving License of the authorized individual acting on behalf of the legal entity.

Source of Funds: Financial Statements, Bank or Trading Account Statement, Tax Return, or any other document supporting the source of funds of the legal entity.

6. Record Keeping

To perform our AML and CTF controls, TagorTrade preserves documents and information as required by prevailing legislation and local requirements in various jurisdictions. This includes customer due diligence, ongoing monitoring, and governance records, detailing the reasons for decisions and actions taken from an AML and CTF perspective. Employee training records and internal periodic/annual reports are also retained, in addition to records of internal and external suspicious activity reports. The retention period for such data is a minimum of five (5) years, calculated from the date business relationships are terminated.

7. Training

All employees of TagorTrade, regardless of their seniority, are required to undertake AML-related training. This training is refreshed annually and includes background information on money laundering, potential offenses, the role of colleagues in detecting potential risk triggers, and escalating their detection, along with case studies.

8. Amendments

TagorTrade reserves the right to amend this AML/KYC Statement from time to time. In case of a material change to this statement, we will inform clients by publishing an updated version on our website. The prevailing version of the AML/KYC Statement is available on the Company's website. This Statement updates and replaces our prior AML/KYC Statements with the latest available and applicable version. For any further information and/or clarifications, please contact the Compliance Department via email at support@tagortrade.com.