



ANTI-MONEY LAUNDERING (AML) POLICY

1. 1.Policy Statement and Principles

- 1.1. GF Markets Ltd (the “Company” or “GF Markets Ltd”) is an entity incorporated in Saint Lucia with the following registrations: Company Number 2023-00089. The Company complies with all applicable laws and regulations in Saint Lucia.
- 1.2. The Company has adopted certain anti-money laundering (the “AML”) procedures that comply with the AML regulations and the International Anti Money Laundering Law (the “AML Law”). The present policy (the “Policy”) applies internally to all Company’s officers, employees and regulates all the procedures related to the products and services provided by the Company. The AML Policy applies to all individuals working at all levels within the Company, including senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term employees, all of whom are collectively referred to as ‘Personnel’ in the present.
- 1.3. The Company and its affiliates have implemented risk-based procedures reasonably expected to prevent, detect, and cause the reporting of transactions required under the AML Law. All efforts undertaken by the Company are duly documented and retained in accordance with the provisions of the AML Law and are kept by the compliance department/ of the Company (the “Compliance Committee”) and the appointed anti-money laundering compliance officer (the “AML Compliance Officer”) who are responsible for initiating suspicious activity reports (the “SARs”) or other required reporting to the appropriate law enforcement or regulatory procedures.

2. Anti-Money Laundering (AML) Policy

- 2.1. GF Markets Ltd is committed to the highest standards of the Anti-Money Laundering (AML) compliance and Counter-Terrorism Financing (CTF) regulations and the management and employees of the Company are obliged and guided to follow the anti-money laundering (AML) standards.
- 2.2. The main purpose of the AML Policy is to focus on the prevention of illegal activities (such as fraud, corruption, terrorism, etc.), and it is designed to provide internal direction within the Company on the approach and management of Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF).
- 2.3. The AML Policy supports management’s objective of mitigating the following risks:
 - 2.3.1. Money laundering.
 - 2.3.2. Terrorist financing.
 - 2.3.3. Sanctions.
 - 2.3.4. Politically exposed persons (PEPs).
 - 2.3.5. Legal and regulatory risk.
- 2.4. According to the Company’s internal process, all illegitimate transactions referred to as money laundering are divided into 3 stages:

- (1) Placement; At this stage, funds are converted into financial instruments, such as checks, bank accounts, and money transfers, or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make several deposits instead of depositing the whole sum at once, this form of placement is called smurfing.
- (2) Layering; Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace the money being laundered.
- (3) Integration; Funds get back into circulation as legitimate to purchase goods and services.

2.5. GF Markets Ltd actively prevents any actions, as described in section 2.4 above that aim or facilitate the process of legalizing of illegally gained funds and prevents the use of the Company's services by externals in terms of illegal actions.

2.6. GF Markets Ltd does not accept and/or pay cash under any circumstances, and reserves the right to suspend any client's operation, which might be regarded as illegal or, may be related to money laundering according to the applicable internal procedures of the Company.

3. Terrorist Financing

GF Markets Ltd have implemented proper and adequate customer due diligence (CDD) measures for all existing and potential customers with the purpose to prevent terrorist financing, such as implemented according to the risk category of each customer and commence prior to entering into the business relationship and on an on-going basis thereafter.

4. Money Laundering Reporting Officer (MLRO)

4.1. GF Markets Ltd has appointed a Money Laundering Reporting Officer (the "MLRO"), who is the AML Officer, and a Deputy MLRO, who is the Head of Operations & Marketing to act in her absence. The MLRO is the officer nominated to receive disclosures in respect of suspected transactions or activity within GF Markets Ltd. All enquiries for more information and/or operational advice on the present AML Policy are forwarded to the following email address:

Email: info@gfmarketsllc.com

4.2. The designated MLRO has the following duties and responsibilities:

- a) Ensuring the Company's compliance with the requirements of the Regulations.
- b) Establishing and maintaining internal AML program.
- c) Establishing an audit function to test its anti-money laundering and combating the financing of terrorism procedures and systems.
- d) Training the Personnel to recognize suspicious transactions.
- e) Receiving and investigating internal suspicious activity and transaction reports from Personnel and making reports to the FIU where appropriate.

- f) Ensuring that proper AML records are kept.
- g) Obtaining and updating international findings concerning countries with inadequate AML systems, laws, or measures.

5. Compliance Procedures

- 5.1. GF Markets Ltd will make sure that it is dealing with a real person or legal entity. GF Markets Ltd also performs all the required measures in accordance with applicable law and regulations, issued by monetary authorities.
- 5.2. GF Markets Ltd taken initially into consideration the fact that international transactions are carried out in different jurisdictions. Therefore, the following risks are calculated as part of the compliance procedures:
 - (1) The applicable laws and regulatory standards from one country to another. People seeking to carry out unlawful transactions may look to exploit discrepancies between jurisdictions. Some places are considered higher risk because they have more lenient or non-existent laws or regulatory structures for cross-border transactions. The company mitigates this type of risk through careful monitoring and reporting of transactions.
 - (2) The account creation and identity verification, where authentication for account creation are key to ensure no transactions are carried out anonymously or under a fake identity.
- 5.3. In relation to deposits and withdrawals on trading account, GF Markets Ltd holds the following strict requirements:
 - (1) Due to AML / CTF laws, GF Markets Ltd cannot receive or deposit funds to third parties.
 - (2) Funds sent to GF Markets Ltd must be from a bank account, Credit/Debit card or Alternative Payment Method (Skrill, China Union Pay, Neteller, Fasapay or others) under the same name as the trading account name with GF Markets Ltd.
 - (3) All funds withdrawn from a trading account must go to a bank account, Credit/Debit card or Alternative Payment Method (Skrill, China Union Pay, Neteller, Fasapay or others) under the same name as the trading account name with GF Markets Ltd.
 - (4) Clients must provide proof of receipt for all transfers completed by Bank transfer. And provide a copy of the Credit card used in the transaction, ensuring the only exposed numbers are the first 4 and the last 4 numbers.
 - (5) All withdrawal requests are processed on First-in-First-Out (FIFO) basis according to the funding source of origination. For example, a deposit is made via Debit/Credit Card; then a subsequent withdrawal request is received. The amount of funds sent back to the relevant Debit/Credit Card, when a withdrawal request is received, may not exceed the original amount deposited from same. Any profits made in excess of the deposited amount will be transferred to a nominated bank account; which must be held in the same name as your trading account.
 - (6) All initial withdrawal requests must be verified for safety and security by provision of a bank statement, which includes account holder information and bank details. GF Markets Ltd will not accept deposits or withdrawals made under a different name to the registered GF Markets Ltd.

- (7) If a trading account was credited in a way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account under the same name as the trading account name with GF Markets Ltd as long as the client provides satisfactory evidence of the ownership of bank account where the funds originated from as well as the destination bank account.

5.4. Restricted Countries

GF Markets Ltd does not operate and/or provide any services to US entities or residents of any kind. While we welcome clients from all over the globe, governmental restrictions along with our company policies prohibit The Company from opening accounts originated from the following restricted and/or OFAC sanctioned countries, as well as high risk and non-cooperative jurisdictions: Afghanistan, Bosnia and Herzegovina, Democratic People's Republic of Korea (DPRK), Guyana, Iran, Iraq, Lao People's Democratic Republic, Myanmar, Papua New Guinea, Syria, Uganda, Vanuatu, Yemen.

6. Reservations by the Company

In the event of an attempt to execute suspicious transactions that are related to money laundering or other criminal activity, it will proceed in accordance with the applicable law and report suspicious activity to regulating authority. GF Markets Ltd reserves the right to suspend any client's operation, which can be regarded as illegal or may be related to money laundering in the opinion of the Personnel. GF Markets Ltd has complete discretion to temporarily block the suspicious client account or terminate an existing client relationship.

7. Our Commitment

We are committed to complying fully with all applicable laws and regulations relating to combatting money laundering and any activity which facilitates the funding of terrorist or other criminal enterprises.

We are responsible for uncovering or reporting any activity that might constitute, indicate, or raise suspicions of money laundering. To this end, we provide continuing education and training for all such persons.

GF Markets Ltd is required to comply with all trade and economic sanctions imposed by OFAC against targeted foreign countries and shall cooperate fully with government agencies, self-regulatory organizations, and law enforcement officials. As required by the Act, GF Markets Ltd may supply information about former, current or prospective clients to such bodies.