



AMEGA

AML & KYC Policy

Effective December 16, 2022

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1. Introduction

Amega Markets LLC is a company registered at Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, St Vincent and the Grenadines, incorporated under the registered number 1080 LLC 2021.

This document describes Amega Markets LLC (hereafter the **Company** or **Amega**) Policy and commitment to the detection and prevention of any money-laundering or terrorism financing activity within the products and services offered by the Company.

Money Laundering is a process intended to mask the benefits derived from serious offenses or criminal conduct as described under the Anti-Money Laundering Act, so that they appear to have originated from a legitimate source. This includes all procedures to change, obscure or conceal the beneficial ownership or audit trail of illegally obtained money or valuables.

Money laundering is also used to hide the link between those who finance terrorism and those who commit terrorist acts. Financing of terrorism can be defined as the willful provision or collection, by any means, directly or indirectly, of funds with the intention that the funds should be used, or in the knowledge that they are to be used, to facilitate or carry out terrorist acts.

Generally, the process of money laundering comprises three stages, during which there may be numerous transactions that could alert the Company to the money laundering activity:

- Placement - the physical disposal of cash proceeds derived from illegal activity. The aim is to remove cash from the location of acquisition to avoid detection. Smurfing – a form of Placement where the launderer makes many small cash deposits instead of a large one to evade local regulatory reporting requirements applicable to cash transactions
- Layering - separating illicit proceeds from their source by creating complex layers of financial transactions (multiple transfers of funds among financial institutions, early surrender of an annuity without regard to penalties, etc.) Designed to disguise the audit trail and provide anonymity; and

- Integration - the provision of apparent legitimacy to criminally derived wealth. If the layering process has succeeded, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter the financial system appearing to be normal business funds. It is the final stage and the process at which the money is integrated into the legitimate economic and financial systems and is assimilated with all other assets in the system. Integration of laundered money into the economy is accomplished by making it appear to have been legally earned.

2. Scope

This Policy applies to all company officers, employees, appointed contractors, agents, products and services offered by the Company. All business units within the Company will cooperate to create a cohesive effort in the fight against money laundering. Each business unit has implemented risk-based procedures reasonably expected to detect and prevent the reporting of transactions. All efforts exerted will be documented and retained.

3. Responsibilities

Amega obeys the principles of AML and TF, and prevents any actions that direct or facilitate the process of legalizing illicit funds by implementing a set of procedures and policies.

The Company is obliged to report suspicious activities of clients related to money laundering.

4. Rights

Before opening an account, we shall see to it that satisfactory and competent evidence is properly obtained on the identity of their customers and that effective procedures have been applied for such verification especially on new customers. Customer Account Information Form (CAIF) is kept for the customers.

The Company always requires its clients to submit information particularly on the source of funds.

The Company might refuse to execute particular transfers of funds if it believes these to be related in any way to money laundering.

Based on the risk, we will analyze any logical inconsistencies in the information or behavior of its customers. If a potential or existing client either refuses to provide the information described in the above chapters, or appears to have intentionally provided misleading information, a new account will not be opened and, after evaluating the risks involved, will consider closing any existing account.

5. KYC Procedure

The identification of customers seeking to open an account with us is an essential part of our KYC process. The Company does not enter into any service relationship until the identity of the new customer or the person acting on his/her behalf (Beneficial Owner) is fully verified. Information must be provided to learn:

- the true Identity of the Customer
- the nature of the Customer's Business; and
- the intended Purpose of the Customer's transactions.

In order to pass the verification, clients are required to provide the below:

5.1. Individual client

- a. Proof of identity document: International passport or Valid National ID card or Valid Driver's License. The indicated documents should not be older than 6 months from the filing date.
- b. Proof of residence document: A utility bill (electric, gas, telephone etc) or a bank or credit card statement or a local authority tax bill. This document must have your name and address on it, be dated within the last 6 months and not online.

5.2. Corporate client

- Corporate application form
- Board of directors resolution for the account opening and which specify the authorized persons to manage the account
- Certificate of Directors and Secretary
- Certificate of Registered office
- Certificate of Beneficial Owners
- Certificate of Good Standing
- Memorandum and Articles of Association
- KYC documents for each shareholder that has more than 25% stake in the Company; and
- KYC documents of the authorized person and directors of the company.

Documents must not be older than 6 months and original or true copies of the original certified by a lawyer or notary.

The Company reserves the right to impose additional due diligence requirements to accept Clients residing in certain countries. Also, it shall apply heightened scrutiny to clients, who are residents of other countries, identified by any authority as having inadequate AML standards or that may represent a high risk for crime and corruption.

The above procedure is executed to verify the identity of the client and to assist us to understand the client and his/her investment requirements to be able to provide you the best possible services based on client profile.

Under Applicable Regulations, the Company will keep records containing Client's personal data, trading information, account opening documents, communications and anything else which relates to the Client at least five (5) years after the termination of the Client Agreement.

6. Monitoring of Customer Activity

The Company monitors suspicious and revenue-intensive transactions closely, takes timely, appropriate actions on said transactions and informs the appropriate bodies without undue delay.

The system of monitoring implemented by the Company relies both on automated monitoring and, where appropriate, manual monitoring by the staff.

7. Deposit and Withdrawal Requirements

The Company monitors funding from various bank accounts outside of the account holder's home country. In case of bank transfer or transfer from a bank card, the name indicated during the registration must match the name of the owner of the account/bank card.

The Company neither accepts cash deposits nor disburses cash under any circumstances.

The withdrawal process detailed below is structured around strict guidelines to make sure that funds are securely sent back to their originating source and beneficiary:

- Our customers must submit a withdrawal request containing their correct account information
- All withdrawal forms are submitted to our accounts department for processing. Our Accounts department confirms the account balance, verifies that there are no holds or withdrawal restrictions on the account, and then approves the withdrawal request, pending compliance approval
- Our Accounts department reviews all withdrawal requests, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file. Our accounts department examines the withdrawal request against the customer's deposit history to make sure there is no suspicious activity and verifies the bank account on file
- Withdrawal requests approved are processed by the accounts department and the funds are released to the client

- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by our compliance department; and
- Our Management will work with the Compliance department to see if further action is needed and if any relevant regulatory bodies need to be contacted.

8. Declaration

The Company reserves the right to review and or update the present policy, whenever it deems necessary.

9. Contact Details

In case you need any further information about our Anti-Money Laundering and KYC Policy, please contact our Compliance Department at support@amegafx.com