



AML Policy



1. The Company's trading services involve monetary transactions. That being so, the Anti-Money Laundering (AML) Policy is established by the Company to maintain a lawful business operation.

2. In compliance with this policy, the Company will sift unlawful activities such as financial fraud, tax evasion, embezzlement, terrorist financing, and other operations that involve concealing illegally obtained money.

3. The Company keeps a record of Client transactions and reserves the right to reject the provision of these records to any individual or entity if it seems fits. Client records can be used to identify the Client's competence to use the Company's services, including but not limited to risk levels and criminal records.

4. The Client understands and accepts that the KYC Process is integral to this policy, and the Client's data may be used to detect and prevent illegal money operation. The Company may cooperate with the relevant authorities if the Client is deemed or proven involved in unlawful activities.

5. Obtained data will be used to audit Internal Revenue Service (IRS) and Suspicious Transaction Reports. The Company's internal audit includes a code of conduct to identify Clients in countries without adequate AML regulations.

6. If the Client's risk level is low, the Company may simplify its measures but will not entirely disregard its AML procedures. On the other hand, the Company can apply additional verification measures to Clients with a high-risk level.

7. If a third party intends to perform transactions on behalf of the Client, a power of attorney is required, subject to the Company's approval.

8. The Company can refuse to enter into transactions with anonymous third parties. The Company has the right to waive operations and transactions with any user who does not provide sufficient information or documentation.

9. The following cases are taken into account to prevent illegal financing operations and to identify if the Client has a higher risk level:

- A.) Identify the Client's risk from his/her occupation's field, including its legal form and management structure, and whether the Client is involved in a civil law partnership or trust fund.
- B.) Identify the Client's country of jurisdiction and if it is included in a low tax-rate community or if the illegal financing regulations are not minutely enforced.
- C.) Consider countries that cooperate with criminal organizations or countries that are used to pursue unlawful operations.

D.) Tighten verification measures if the Client's transactions seemed unusual or economically impracticable, including, but not limited to, constant change of information, a rapid increase of capital, and rendering services to anonymous third parties.

E.) Tighten measures to Clients with backgrounds of developing weapons related to mass destruction, including participating in operations with cash plays such as currency exchange locations and gambling operations.

10. In case the individual has a limited legal capacity, the Company will evaluate the individual's conditions and whether he/she can still access the Company's services. If the Client becomes unable to perform in critical conditions, the Company can immediately terminate any business relationship.

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