



TRADERS EMPIRE
INTELLIGENT WEALTH
— LEVERAGING —

ANTI-MONEY LAUNDERING POLICY

TRADERS EMPIRE LLC
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Traders Empire LLC [NO. L 23471] (“the Company”, “Traders Empire”, “we”, “our” or “us”) is registered in Island of Nevis, Charlestown, Nevis West Indies.

The company provides online platforms for clients to trade over-the-counter (OTC) derivatives, including margin foreign exchange (“Forex”) contracts and contracts-for-difference (“CFDs”). The company’s online platforms operate through the tradersempire.com website (“Website”) and the Traders Empire mobile applications (the “Apps”).

1. GENERAL DEFINITION

Money laundering is the act of converting money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human trafficking etc.) into money or investments that appear to be legitimate. Such activity is used so that the illegal source of money and other material values cannot be traced.

2. POLICY STATEMENT AND PRINCIPLES

The Company has adopted a program that complies with the AML/CTF Act. This policy applies to all The Company officers, employees, appointed producers and products and services from The Company.

All business units and locations within The Company will cooperate to create a cohesive effort in the fight against money laundering. Each business unit and location has implemented risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the International Anti-Money Laundering Law.

All efforts exerted will be documented and retained in accordance with the Anti-Money Laundering Law. The AML Compliance Committee is responsible for initiating Suspicious Activity Reports (“SARs”) or other required reporting to the appropriate law enforcement or regulatory agencies. Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the AML Compliance Committee.

It is the policy of The Company to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. The Company is committed to AML compliance in accordance with applicable law and requires its officers, employees and appointed producers to adhere to these standards in preventing the use of its products and services for money laundering purposes.

3. CUSTOMER INFORMATION VERIFICATION

In verifying customer identity, appointed compliance officers shall utilize verification tools to review customer’s photo identification. The Company shall not attempt to determine whether the document that the customer has provided for identification has been validly issued.

For verification purposes, The Company shall rely on a government-issued identification to establish a customer’s identity. The Company, however, will analyze the information provided to determine if there are any logical inconsistencies in the information obtained.

The Company will document its verification, including all identifying information provided by the customer, the methods used and results of the verification, including but not limited to sign-off by the appointed producer of

matching photo identification.

If a customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, the compliance officers shall notify the Compliance Manager. The Company will thereafter decline the application.

4. PREVENTION OF THIRD PARTY FUNDING, TRANSFER & WITHDRAWAL

The Company strictly does not allow third party funding. Any funds coming to the account must come from the same account holder.

The Company strictly does not allow transfer of trading funds between different trading accounts belonging to different account holders. This is to prevent the possibility of money laundering.

The Company strictly implements the policy in which withdrawals must be performed only through the same bank account, credit/debit card or digital wallets that clients used to deposit the funds. All client withdrawal requests shall be processed in the currency in which the deposit was originally made.

5. MONITORING AND REPORTING SUSPICIOUS ACTIVITY

The Company collects and verifies identification data of the Client and also logs and tracks itemized statements of all transactions carried out by the Client.

If The Company tracks suspicious transactions of the clients and transactions executed under nonstandard conditions. The Company performs its anti-money laundering compliance on the basis of AML/FATF recommendations.

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

In addition, any wire deposit of USD 100,000 and above may be subjected to approval prior to acceptance of funds. The Client may be required to complete an ECDD (Enhance Customer Due Diligence) procedure. If approval is not given, funds may be rejected and returned, and applicable charges are borne by the Client.

The Company reserves the right to refuse to process a transaction at any stage, when it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, The Company is not obligated to inform the client that they were reported to the corresponding governing bodies due to the client's suspicious activity.

6. RESTRICTED COUNTRIES

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, Australia, Belarus, Belgium, Central African Republic, Cuba, Cyprus, Ethiopia, France, Indonesia, Lebanon, Libya, Nicaragua, North Korea, Sudan, Syria, United States, Venezuela, Yemen & Zimbabwe.