



## Definition of money Laundering

**Modern society currently faces a serious challenge in preventing money laundering, e.g. making the possession, use, or disposal of money or other property obtained from criminal activities appear to be legal, and terrorism financing - providing or gathering money or rendering financial services with the knowledge that the money is intended to finance the organization, preparation for, or execution of terrorist acts or to support a criminal society (criminal organization) created or being created to perform terrorist acts. Individuals and legal entities whose income is earned illegally make various attempts to legalize their income. For example, they may use other people's personal data, including data that has been acquired fraudulently. This may become a problem for people who become victims of fraud and are uninvolved in these parties' criminal activities.**



## General rules for payments

- (a) The term “instant” shall be understood to mean that a transaction is carried out within a few seconds without manual processing by financial dependent specialists.
- (b) Funds may only be withdrawn to the registered AAA Trading account holder’s personal bank account; this is in order to ensure financial security and prevent money laundering.
- (c) The company will not accept direct payments or payments to third parties; all necessary information is available from AAA Trading account’s Personal Area when completing a transaction.
- (d) Deposits and withdrawals may be made 24 hours a day, 7 days a week. For payment systems offering instant withdrawals, if a deposit or withdrawal is not carried out instantly, it will be completed within 24 hours. Note that the processing time can vary based on the payment system.
- (e) The company shall not be liable for delays in processing deposits and withdrawals if such delays are caused by the payment system.
- (f) A withdrawal must be made using the same payment system, same account, and same currency used as for the deposit. When AAA Trading account holder funds a trading account using multiple payment systems, or multiple wallets within the same payment



system, funds must be withdrawn in proportion to the amounts deposited. In exceptional cases this rule may be waived, pending account verification and under strict advice of our payment specialists.

(g) The company retains the right to change the processing time for deposits and withdrawals without notification in advance.

(h) The company may place limits on the payment systems available to clients from certain countries.

- The company has the right to investigate, cancel and/or impose fees/charges (depend on payment method) on any withdrawal request originating from a trading account with no trading activity.

- A withdrawal action can be rejected if a pattern of deposits and withdrawals occur on a trading account with no trading activity. This is a measure to ensure that trading accounts are used appropriately.

## Laws against money laundering

To prevent money laundering, organizations performing operations with money or other property are obligated to comply with anti-money laundering laws, verify the identity of clients, and assist government agencies and financial organizations working to combat money laundering. AAA Trading does everything required to ensure compliance with



laws against money laundering and financing terrorism.

## **Doubtful Operations**

**(a) The Company shall monitor execution of these General Business Terms and be obliged to investigate doubtful operations of the Client by stopping such operations for necessary time.**

**(b) In case of investigation of doubtful operations of the Client, the Company shall be obliged to demand the documents which are necessary for investigation from the Client.**

**(c) Signs of doubtful operations:**

- Execution of a great number of transfers in the absence of operations on the trading account;**
- Execution of operations devoid of apparent economic sense or other apparent purpose bearing the legal nature;**
- The client' s denial of delivery of personal information for identification purposes or impossibility to prove the client' s identity;**
- Repeated attempts to execute non-trading transactions for benefit of third parties;**
- Forgery of the documents given by the client,**



mismatch of documents, provided in different time periods and falsely represent oneself to be another person.

(d) The provided signs of doubtfulness operations shall not be completed. A transaction can be found doubtful by specialists of the Company as a result of complex analysis and concomitants.

(e) The Company has the right to cancel questionable operations by the Client and/or charge commission(s) on the deposit/withdrawing operations of a Client and/or block all his trading accounts as well as trading accounts of Clients involved in the conducting of these operations. In this case the funds of the Client shall be withdrawn by any method convenient for the Company.

## **Client identity verification procedure**

As part of complying with laws on client identification, this procedure is performed during registration, various types of non-trading operations, and as part of monitoring by our specialists. In order to identify our clients, AAA Trading may ask you for personal data and take steps to confirm the accuracy of this information using a verification system developed by our specialists. It may take several work days to complete this process.

As part of our mission to protect our clients from



fraud and abuse, AAA Trading requires all forex account holders to verify their identity and residency. Client will need to provide verification of your identity and residence/address for a fully verified AAA Trading account. At AAA Trading, proof of identity is referred to as POI while proof of residence is referred to as POR.

## Identification

(a) Verification of the Client' s identity is made in order to prevent any unauthorized access to the Client' s account and is held by verification of the fact that the operations are made exactly by the Client.

(b) During registration of a trading account the Client must provide the Company with correct and true information for identification in accordance with the Company' s requirements (hereinafter referred to as the "Identification data"), as determined in its sole discretion. The Client shall inform the Company about changes in identification data in proper time.

(c) Personal data which shall be verified embodies ID or passport details and registration address, email address, phone number etc.

(d) Passport details and address are being verified by the provided documents. For address confirmation Utility bill, telephone bill, electricity bill can be provided. Email address is verified by sending email to it with verification code. Telephone number is verified



by sending SMS with code.

**(e) The list of non-trading operations for which verification procedure is demanded:**

- **Withdrawal requests;**
- **Change of Access Data etc.**

**(f) Means of the client verification (security types) are:**

- **By e-mail;**
- **By sms;**

**(g) E-mail security type embodies sending by the Company to the Clients email, pointed out during the registration, a verification code which should be entered on the Company website for processing of non-trading operations which demanded verification.**

**(h) SMS security type embodies sending by the Company to the Clients telephone, pointed out during the registration, a verification code which should be entered on the Company website for processing of non-trading operations which demanded verification.**

**(i) The Client may choose the security type during the registration process.**

**(j) information provided by the Client during registration fully matches that contained in the documents provided by the Client at the Company's request. If the**



**Client changes the security type, withdrawal of funds can be made only after 3 working days from the moment of changing security type.**

**(k) The Company shall reserve the right to suspend execution of non-trading operations if the Client's identification data are found incorrect or invalid as well as the Client does not send the requested documents.**

**(l) In case the Client loses the main password and e-mail specified at registration, the account will be closed after a complete check and the funds will be withdrawn proportionally to the account (s) they were deposited from.**

**(m) In order to identify the Client, the Company has the right to request at any time after a trading account is registered, inter alia, information and/or documentation and/or video call for proof of identity, proof of residence, source of funds.**

## **Document requirements**

**Verification documents need to meet certain requirements or they may be rejected and delay the process.**

### **For Proof of Identity (POI)**

- Document provided must have the client's full name.**





- Document provided must have a photo of the client.
- Document provided must have the client's date of birth.
- Full name must match the name of the account holder and the POI document exactly.
- Client's age should be 18 or above.
- The document should be valid (at least one month of validity) and not expired.
- If the document is two-sided, please upload both sides of the document.
- All four edges of a document should be visible.
- If uploading a copy of the document, it should be of high quality.
- The document should be issued by the government.

## **Important to note:**

The POI document should have been officially issued by a legitimate authority and must certify the name, age and photo of the person holding it. The document doesn't necessarily have to have been issued in the client's place of birth or country of citizenship.



For example, an Indian client living in Colombia can use a POI document issued in India, Colombia or any other country where we accept clients from. It is important to note that we do not accept POI documents issued in these specific countries: American Samoa, Baker Island, Guam, Howland Island, Jarvis Island, Johnston Atoll, Kingman Reef, Marshall Islands (the), Midway Islands, Navassa Island, Northern Mariana Islands, Palmyra Atoll, Puerto Rico, United States Minor Outlying Islands, United States of America, United States Virgin Islands, Vatican city, and Wake Island.

Formats accepted: Photo, Scan, Photocopy (All corners shown) File extensions accepted: jpg, jpeg, mp4, mov, webm, m4v, png, jpg, bmp, pdf File size accepted: Up to 64 MB

**Examples:**

- International passport
- National identity card/document
- Driver' s license
- Permanent residence card

**For Proof of Residence (POR)**

- The document should have been issued within the past 6 months.



- Name displayed on the POR document must match the full name of the AAA Trading account holder and POI document exactly.
- All four edges of a document should be visible. •If the document is two-sided, please upload both sides of the document.
- If uploading a copy of the document, it should be of high quality.
- The document should contain the client's full name and address.
- The document should contain the issue date.

The POR document should have been officially issued by a legitimate authority and must certify that the client is residing in the country from which they have opened their account with AAA Trading. This is done in order to ensure that the client has a permanent residence in the country chosen during account registration. Formats accepted: Photo, Scan, Photocopy (All corners shown) File extensions accepted: jpg, jpeg, mp4, mov, webm, m4v, png, jpg, bmp, pdf File size accepted: Up to 64 MB

**Examples:**

- Utility bill (electricity, water, gas, Internet, landline telephone)
- Recent bank statement.



- Local tax bill

- Reference letter from your bank (located within your country of residence)

Verifying your identity and address is an important step that helps us to keep your account and financial transactions secure. The verification process is just one of a number of AAA Trading security measures implemented to protect our traders.

Do note that it may take our specialist a few hours to verify your documents.

## **Compliance with the Privacy Agreement**

The personal data we receive is handled in accordance with the provisions of the Privacy Agreement. Please note that the reason for the identification procedure is to comply with laws against money laundering and financing terrorism, not because we suspect you of committing illegal acts. Accordingly, your cooperation and understanding of these steps is necessary to effectively combat money laundering and financing terrorism.