Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy

Introduction and Corporate Identity

NFXTrade is operated by Fynsera Capital Ltd an International Business Company incorporated in the Union of the Comoros, bearing registration number 16300, with its registered address at Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of the Comoros. The Company operates as a licensed International Brokerage regulated by the Anjouan Offshore Finance Authority (AOFA) under license number L16300/FC

1. Regulatory Framework and Operational Objectives

- Money laundering constitutes the deliberate manipulation of illegally acquired wealth to obscure its true nature, origin, or source.
- The primary objective of money laundering is to seamlessly place illicit funds into the formal financial system without arousing institutional suspicion.
- A secondary objective is to transfer and move capital through a series of complex, layered transactions, rendering the original source exceedingly difficult to trace.

2. Mandatory Client Identification and Verification (KYC)

- The Company is legally obligated to acquire specific identifying information concerning its clients. Distinct client categories need specific identification and verification protocols.
- Failure by the institution to rigorously obtain and verify the particulars defined in the "Know Your Client" frameworks constitutes a severe legal offense, rendering the entity liable to regulatory fines or criminal imprisonment upon conviction.
- To verify the identity of natural persons, Company representatives must execute a strict two-document verification procedure prior to facilitating transactions:
    - **Proof of Identification (POI):** A valid, government-issued document bearing the Client's photograph. Acceptable documents include a government-issued passport, a national identity card, or a driver’s license (applicable only in jurisdictions where a driver's license serves as a primary identity document).
    - **Proof of Residence (POR):** A document explicitly displaying the Client's legal name and actual residential address, issued no earlier than three (3) months prior to submission. Acceptable documents include utility bills, bank statements, or official correspondence from a nationally recognized organization.

- Clients are strictly mandated to submit updated identification and contact documentation in a timely manner whenever their personal circumstances change.

3. Anti-Third-Party Payment Protocols

- The Company strictly prohibits third-party payments. All incoming deposits must originate from an account where the sender's name exactly matches the verified legal name of the Client maintained in our corporate records.
- To enforce closed-loop financial routing, withdrawals are exclusively processed via the exact method and routed to the exact account utilized for the initial deposit.
- If a deposit was executed via bank wire transfer, outbound funds may only be withdrawn via wire transfer directly to the originating bank account.
- If a deposit was executed via electronic currency transfer or e-wallet, outbound funds may only be withdrawn through the identical electronic system directly to the originating digital account.
- In all withdrawal scenarios, the name of the recipient must flawlessly match the Client's name in the Company’s records.

4. Ongoing Monitoring and Accuracy of Client Particulars

- In respect of all ongoing business relationships, the Company must execute reasonable steps to maintain the real-time correctness of client particulars that are susceptible to alteration over time.
- "Know Your Client" (KYC) compliance checks must be actively performed every time the Company enters into a transaction with a client.
- Should any Company employee become aware of a material change in a client’s profile, updated documentation must be obtained immediately.

5. Third-Party Representation and Mandates

- When a third party acts on behalf of a Client, the Company must deploy supplementary identification and verification requirements.
- The Company is required to obtain explicit, legally binding proof of the representative's authority to act, which includes a formal Mandate or a notarized Power of Attorney.

6. Risk-Based Approach (RBA) and Enhanced Due Diligence (EDD)

- The Company relies on a Risk-Based Approach to verify client particulars, utilizing reasonably practical methods to achieve reliable verification.

- High-risk client profiles are subjected to a significantly higher degree of Enhanced Due Diligence (EDD) compared to lower-risk profiles.
- The fundamental premise of this approach implies that as the assessed risk profile escalates, the level of verification must increase proportionally, mandating the use of the most secure verification methodologies available.

7. Recordkeeping and Data Retention

The Company adheres to strict record-retention mandates concerning client identification, verification, and transaction histories, regardless of whether a transaction is singular or part of a sustained business relationship:

- **Business Relationships:** All associated KYC and operational records must be retained for a minimum of five (5) years commencing from the exact date the business relationship is formally terminated.
- **Transactional Data:** Records pertaining to single transactions must be securely stored for at least five (5) years following the conclusion of the transaction.
- **Suspicious Transaction Reports (STRs):** If a transaction triggers an official regulatory report, all associated files must be preserved for a minimum of five (5) years from the date the report was filed.
- The requirement to maintain adequate records for a minimum of five years is recognized as essential for assisting authorities with the ultimate investigation and prosecution of financial crimes.

8. Suspicious and Unusual Transaction Reporting (STR)

- The relevant legal statutes strictly demand the active reporting of suspicious and unusual financial transactions, serving as the foundational element of any national AML program.
- Whenever signs of suspicious activity suggest potential money laundering, the Company will immediately initiate additional due diligence before proceeding with any pending transaction.
- If a reasonable, legitimate explanation for the activity cannot be determined by compliance officers, the Company is legally obligated to report the suspicious activity to the relevant authorities in strict compliance with the Law.

9. Mandatory Employee Training

- The Company is obligated to provide comprehensive, ongoing training to all employees. This training is designed to ensure strict, continuous compliance with the provisions of the Law, internal corporate procedures, and this overarching AML Policy.

10. Sanctions Screening, PEPs, and Unilateral Right to Freeze Assets

- **Global Sanctions and PEP Screening:** The Company screens all clients against global sanctions lists (including OFAC, UN, EU, and HMT) and databases for Politically Exposed Persons (PEPs) at onboarding and continuously throughout the relationship. Any account matching a designated sanctions list will be immediately rejected or blocked.
- **Source of Funds (SOF) and Source of Wealth (SOW):** The Company reserves the right to request corroborated SOF and SOW documentation at its sole discretion. Failure to provide adequate proof will result in the immediate rejection of deposits or the withholding of withdrawals.
- **Right to Freeze Assets:** If the Company suspects, in its sole and absolute discretion, that an account is linked to money laundering, terrorist financing, or financial fraud, the Company reserves the unilateral right to freeze the account, seize suspected illicit profits, block all withdrawal requests without prior notice to the Client, and hold funds indefinitely pending a resolution from the AOFA or relevant international law enforcement agencies.