



Anti-Money Laundering (AML) Policy

Introduction:

Septa FX Capitals LTD (hereinafter referred to as "the Company") is committed to combating money laundering and terrorist financing activities. This Anti-Money Laundering (AML) Policy outlines the procedures and guidelines the Company adheres to in order to prevent and detect any attempts of money laundering or terrorist financing within its operations.

Policy Statement:

The Company is dedicated to maintaining a robust AML framework to ensure compliance with all applicable laws, regulations, and industry standards related to anti-money laundering and counter-terrorist financing activities. Our policy is based on the principles of due diligence, customer identification, reporting of suspicious activities, and ongoing monitoring.

Customer Due Diligence (CDD):

Customer Identification: The Company will establish and verify the identity of all customers prior to establishing any business relationship or executing transactions. This includes obtaining identification documents such as government-issued IDs, passports, or other reliable documents.

Risk Assessment: The Company will assess the risk associated with each customer based on factors such as their location, type of business, transaction history, and source of funds.

Enhanced Due Diligence (EDD): Enhanced due diligence measures will be applied to customers deemed to pose a higher risk of money laundering or terrorist financing activities. This may include obtaining additional information, conducting more frequent monitoring, or obtaining senior management approval for the business relationship.

Monitoring and Reporting:

Transaction Monitoring: The Company will implement robust systems and procedures for monitoring transactions to identify any unusual or suspicious activities. This includes monitoring for large or unusual transactions, patterns of activity inconsistent with the customer's profile, and transactions involving high-risk jurisdictions or individuals.

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Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia.



Suspicious Activity Reporting:

Any suspicions of money laundering or terrorist financing activities will be promptly reported to the appropriate authorities in accordance with applicable laws and regulations. This includes filing suspicious activity reports (SARs) with the relevant financial intelligence unit.

Employee Training:

All employees of the Company will receive regular training on anti-money laundering procedures, including customer due diligence requirements, identification of suspicious activities, and reporting obligations. Training will be conducted upon hiring and on an ongoing basis to ensure that employees remain up-to-date with the latest developments in AML regulations and best practices.

Record Keeping:

The Company will maintain accurate and up-to-date records of all customer identification information, transaction records, and any suspicious activity reports. Records will be retained for the minimum period required by law and will be made available to regulatory authorities upon request.

Compliance Oversight:

The Company will appoint a designated compliance officer responsible for overseeing the implementation of this AML policy, ensuring compliance with applicable laws and regulations, and conducting regular reviews and audits of the effectiveness of our AML procedures.

Suspicious Activity

There are signs of suspicious activity that suggest money laundering. These are commonly referred to as "red flags." If a red flag is detected, additional due diligence will be performed before proceeding with the transaction. If a reasonable explanation is not determined, the suspicious activity shall be reported to the AML Compliance Committee

For increased risk level products, in addition to obtaining the standard information detailed above, the following know your customer information should be obtained and recorded:

Employment and income details

Source of wealth (i.e. source of the funds being used in the transaction)

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Evidence of Address

Current bank statements, or credit/debit card statements, issued by a regulated financial sector firm (but not ones printed off the internet and not less than 3 months old)

Utility bills (not including mobile phone bills, not ones printed off the internet and not less than 3 months old)

Source of Funds

When a transaction takes place, the source of funds, i.e., how the payment is to be made, from where and by who, must always be ascertained and recorded in the client file (this would usually be achieved through retaining a copy of the cheque or direct debit mandate).

Customer Identification Program

Septa FXCapitlas Limited has adopted a Customer Identification Program (CIP). We will provide notice that they will seek identification information; collect certain minimum customer identification information from each customer, record such information and the verification methods and results.

Product Risk

This is the risk posed by the product or service itself. The product risk is driven by its functionality as a money laundering tool. The Joint Money Laundering Steering Group has categorized the products with which Firms typically deal into three risk bands – reduced, intermediate and increased. Typically, pure protection contracts are categorized as reduced risk and investments in unit trusts as increased risk. Additionally, a factor that will contribute to the classification of the risk category is the sales process associated with the product. If the transaction in the product takes place on an advisory basis as a result of a KYC, this will carry less risk than an execution only transaction, whereby you know significantly less about the customer.

Country Risk

The geographic location of the client or origin of the business activity has a risk associated with it, this stems from the fact that countries around the globe have different levels of risk attached to them. A firm would determine the extent of their due diligence measure required initially and on an ongoing basis using the above four risk areas.

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Notice to Customers

Septa FX Global Limited. will provide notice to customers that it is requesting information from them to verify their identities, as required by applicable law.

Conclusion:

Septa FX Capitals LTD is committed to maintaining a zero-tolerance approach towards money laundering and terrorist financing activities. This AML policy reflects our dedication to implementing robust controls and procedures to prevent and detect any attempts at illicit financial activities within our operations. We will continually review and update our policies and procedures to adapt to changing regulatory requirements and emerging threats.

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