

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

Finrooms money laundering policy

Money laundering is the process of converting funds derived from illegal activities (fraud, corruption, terrorism, etc.) into other funds or investments that look legitimate to hide or distort the actual sources of those funds.

In order to combat the penetration of money derived from criminal activities into the economy and to prevent terrorist activities, countries are engaged in the fight against money laundering. Due to the openness and accessibility of financial markets and the free movement of capital within them, financial institutions may be one way to legalize criminal income. Therefore, Whitefish Limited uses laws and regulations to combat money laundering and terrorist financing.

General provisions

This document describes the policy of Whitefish Limited, website finrooms.com (hereinafter the Company) on combating money laundering, as well as its involvement in identifying and preventing any activity related to money laundering, terrorist financing, and the potential use of the Company's products and services for the purpose of money laundering (hereinafter the AML Policy).

Verification (KYC - Know Your Clients)

We adhere to general provisions for client verification.

For verification, we request a document proving the identity of the client, photos of cards/screenshots of wallets, and photos with documents in hand. In order to comply with the laws on countering the legalization of illegally obtained funds, the Company may require the client to submit additional documents (utility bills, notarized copies of documents, Skype conference calls). Clients send the documents to support@finrooms.com in image file formats (Jpg, Jpeg, BMP, Pdf). Documents cannot be accepted in rar or zip archives or in doc, docx, or other text formats.

Requirements for identity documents.

Generally, it is the open pages of the passport or ID card on both sides. The document must be completely visible in the photo, without any edges or corners cut off, and without any glare from the flash or any elements excluded. The personal signature on the document may be covered. All data on the document must be readable and legible. The document will be visually checked for the use of Photoshop or other image editors. The trader must be 18

years old or older at the time of account creation. The document must be valid. Watermarking is permitted.

Ways to check the document for validity if there are suspicions it is not:

AML online check services that are checked by the AML Global Watchlist ("global AML risk data sources including sanction lists (such as OFAC, UN, HMT, EU, DFAT, and many more), law enforcement lists (Interpol, country-specific government and state agencies, and police forces), and governing regulatory bodies (financial and securities commissions) from around the world.")

Requirements for bank cards.

The card should be completely visible in the photo, without any edges or corners cut off, and without any glare from the flash. The following should be visible in the photo of the card:

- The cardholder's first and last name
- The first 6 and last 4 digits of the card number
- The card's expiration

If the cardholder is not listed on the card, then confirmation is requested of who the card belongs to. This is a screenshot of the online bank account where the cardholder's full name is visible. Or it is a statement from the bank showing the card was issued to the owner. The statement must contain the name of the cardholder, the card number (incomplete data is allowed), the bank operator's signature, and the bank's stamp.

Requirements for electronic wallets.

To verify an e-wallet, a screenshot of a deposit to Whitefish Limited will be required. The screenshot should show the payment itself, the time and date of the transaction, and the wallet number. Electronic wallets also require a screenshot of the page showing personal data (if possible). For 2 screenshots, there should be general information visible to make it clear that the screenshots were taken of the same wallet.

Requirements for photos with documents in hand (selfies).

The passport must be completely visible in the photo and the data must be readable and legible. The signature may be covered. The client's face must be completely visible in the photo and match the photo in the passport (adjusted for age). The passport in the selfie and the passport in the photo should be identical.

Documents in languages other than English must be translated into English by an official translator; the translation must be signed by the translator and sent along with a copy of the original document with a clear photograph of the client on it.

Accounts are verified not only to comply with AML policy, but also to ensure the security of the client's funds.

Deposits/withdrawals of funds

The Company requires that, during a crediting operation, the name of the sender of funds should fully comply with the name given when registering the account (if the payment system provides the name of the sender of funds). Payments from third parties are prohibited. The company has the right to demand strict adherence to the generally accepted procedure for depositing and withdrawing funds.

Company money laundering prevention procedures

It is forbidden to use this site for the purpose of money laundering. The Company applies advanced anti-money laundering procedures. All transactions are monitored to prevent money laundering, which can have various implications for clients. The Company reserves the right to refuse to cooperate, terminate cooperation, and cancel transactions of clients who do not accept or do not comply with these measures to prevent money laundering. Funds accepted by the Company should not be derived from criminal activity. The Company is obliged to report suspicious transactions to the appropriate authorities.

Money laundering prevention procedures may have the following consequences for clients:

1. Clients must provide all the requested personal data when opening an account. This includes a valid ID, address, contact email address, and personal phone number.
2. Withdrawals can only be made in the name of the account holder. If a client deposits funds into an account using a bank transfer, the funds can only be transferred to the owner of the bank account. The client undertakes to provide the correct account number and correctly provide their name for all money transfers to the Company. If a client credits their account using a credit/debit card, the funds will be transferred only to that same card.
3. Clients must register themselves.
4. Clients cannot accept funds to manage from one or more persons in their account with the Company.
5. It is prohibited to sell, transfer and/or purchase invoices to or from other clients. The transfer of funds between clients is also prohibited.
6. A person is allowed to have only one account. Withdrawals or compensation cannot be transferred to accounts opened in with fictitious names, or to multiple accounts opened by the same person.
7. At its own discretion or in accordance with the provisions on conducting client identification procedures, the Company may request from the client an identity document (for example, a certified copy of their passport or another document that the Company deems necessary under certain circumstances). The Company may also temporarily close an account until complete information is provided, proof of the identity and address of the client, the source of their funds and/or the source of their income. If you open an account with [finrooms.com](https://www.finrooms.com), you must provide documents

proving your age when you first withdrew funds from your account. You are also required to provide documents in accordance with the Know Your Client (KYC) policy.

8. The client agrees that we may use the personal information provided by them for the appropriate anti-fraud checks. The personal information that they provide may be transferred to the appropriate organizations or agencies that may require such information in order to combat fraud.
9. We record and monitor telephone conversations, as well as electronic correspondence regarding the conclusion of contracts when working on the account, as well as the provision of services for the execution of orders relating to the reception and execution of client orders. Records can also be used for quality control purposes and to prevent fraud.

We have the right and duty not to accept information provided by a client if we know or have reason to believe that this information is untrue, inaccurate, or incomplete. In this case, we may contact the client for clarification or to correct this information.

The company declares that, in order to comply with the AML policy, money transfers by clients of the company are permitted solely for the purpose of carrying out trading operations aimed at extracting profits within the framework of the proposed services of the company. If the Company has reasonable grounds to believe that money transfers are being used by the account holder in violation of laws and/or the AML policy of the Company, for purposes other than the Company's services offered, the Company reserves the right to block the trading account, as well as the client's personal account (Personal Trader Account), from the carrying out of any operations using that account.

If you have any additional questions, please contact us by email: support@finrooms.com