



ANTI-MONEY LAUNDERING (AML) POLICY

For Customer Vonway Global Ltd



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1 INTRODUCTION

Money laundering is the act of converting money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human traffic 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.

The process of money laundering involves three sequential steps:

- PLACEMENT – Dirty Money enters the Financial System.
- LAYERING – Transfer funds between various offshore/onshore banks.
- INTEGRATION – Purchase of luxury assets financial investments commercial/industrial investments.

2 OBJECTIVE

Vonway Global Limited is committed to actively and effectively prevent the risks Money Laundering and Terrorist Financing and requires the management, and employees to follow the named standards.

3 POLICY STATEMENT AND PRINCIPLES

Vonway Global Limited (hereinafter called the “Company”) is an entity incorporated in Hong Kong with the following registrations: Company Number 2563823. The Company complies with all applicable laws and regulations in Hong Kong.

The Company has adopted a programme 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.

4 POLICY

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.

5 RIGHTS

Vonway Global Limited, collects clients' information and validates proof of identification document of its clients, before the account opening and any payments / refunds. We have the right to record and store such information and make it available to competent authorities if, and as required.

We neither accepts nor pays cash under any circumstances. Vonway reserves the right to refuse to process a transfer of funds, if it believes that it is connected in any way with to criminal activities, terrorist financing or money laundering in the opinion of our staff.

6 CUSTOMER INFORMATION VERIFICATION

In verifying customer identity, appointed compliance officers shall review 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 analyse the information provided to determine if there are any logical inconsistencies in the information obtained. The Company will document it's 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 appointed agent shall notify the chief compliance manager. The Company will thereafter decline the application.

7 KYC PROCEDURE

Know-Your-Client procedure is an important tool for the prevention of ML/TF, identity theft, credit card theft, etc. We are taking every possible step to identify and prevent fraud.

Upon the registration to open a trading account you are required to provide the below:

A **Physical person / individual client**

(i) **Proof of identity**

i.e. a valid and clear copy of your Passport, ID card or driving license. The document shall be valid for at least 6 months from the filing date.

(ii) **Proof of address**

i.e. utility bill (landline, water, electricity, gas, internet), bank statement, local authority tax bill, reference letter from bank or attorney. The document shall be in your name, contain full address details and it cannot be older than 6 months.

B **Legal entity / Corporate client**

(i) Vonway's Corporate account application form;

(ii) Board resolution for the opening of trading account with Vonway and which shall specify the authorized person to run the trading account;

- (iii) Incorporation documents:
 - a. Certificate of incorporation;
 - b. Certificate of Director(s) & Secretary;
 - c. Certificate of Registered office;
 - d. Certificate of Beneficial Owner(s); e. Certificate of Good Standing;
 - f. Memorandum & Articles of Association

**** If the relevant registrar of companies in the country of incorporation does not issue any of the above certificates, then an incumbency certificate shall be provided signed by the secretary of the company, which will confirm the missing information.***

- (iv) Latest audited financial statements or management accounts or Trial Balance signed by the directors;
- (v) Proof of identity and proof of address for each shareholder that has more than 10% stake in the Company;
- (vi) Proof of identity and proof of address of the authorized person and at least 1 director of the Company;

All of the above documents must not be older than 6 months and original or true copies of the original certified by a lawyer or notary.

The Company reserves the right to impose additional due diligence requirements to accept Clients residing in certain countries. Also, it shall apply heightened scrutiny to clients, who are residents of other countries, identified as having inadequate AML standards or that may represent a high risk for crime and corruption.

The above procedure is performed to verify the identity of the client and to assist us to understand you and your investment requirements to be able to provide you the best possible services based on your profile.

8 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 client used to deposit the funds. All client withdrawal requests shall be processed in the currency in which the deposit was originally made.

All the clients' operations to deposit funds have the following requirements:

■ Bank wire transfer

In case of bank transfer, we need to see the confirmation. The name indicated during the registration must match the name of the owner of the account.

■ Credit/ debit Card

If funding with credit or debit card, you should send us a copy of your card (both sides). The name, date of expiry, the last four digits of the card number on the front and signature on the back shall be clearly visible. For your security, we advise to cover the card number except the last 4 digits and the CVV code on the back.

We always return deposited funds to the clients by the same way from which they originated and always on the name of the client, except if:

- the account was credited in the way that cannot be used for funds withdrawal, then the funds may be withdrawn to a bank account of the client or any other way may be used, as agreed with the Company with the help of which the Company is able to prove the identity of the account owner;
- the account has been credited with funds through various payment systems, funds withdrawal shall be made on a pro rata basis commensurate to the size of each deposit.

9 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 based on AML/FATF recommendations.

The Company neither accepts cash deposits nor disburses cash under any circumstances. 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 client's suspicious activity.

10 RESTRICTED COUNTRIES

The Company does not service US entities or residents of any kind. 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, Bosnia and Herzegovina, Democratic People's Republic of Korea (DPRK), Guyana, Iran, Iraq, Lao People's Democratic Republic, Myanmar, Papua New Guinea, Syria, Uganda, Vanuatu, Yemen.

11 DECLARATION

The Company may review and/ or amend the present policy and its sole discretion, whenever it deems necessary.

12 RELEVANT DEPARTMENT

- A. Customer Service Department
Email: support@vonwayforex.com
- B. Compliance Department
Email: compliance@vonwayforex.com