



# Anti-money Laundering Policy

Beaufond Plc



## Preface:

This Anti-Money Laundering Policy ("AML Policy") is testimony to the Beaufond plc's commitments against money laundering and related illegal activities. It describes the Company's policies and procedures instituted to ensure that the trade and Services offered by the Company are not being used by the Users to facilitate commission of any criminal offences. To keep awareness among the employees, stake holders of the company, Beaufond Plc has prepared this AML Policy to ensure the transparency of trading and the prevention of money laundering and other illegal activities.

Money laundering is the process of making illegally-gained proceeds (i.e., "dirty money") appear legal (i.e., "clean"). Typically, it involves three steps: placement, layering, and integration. First, the illegitimate funds are furtively introduced into the legitimate Trade / financial system. Then, the money is moved around to create confusion, sometimes by wiring or transferring through numerous accounts. Finally, it is integrated into the financial system through additional transactions until the "dirty money" appears "clean".

Beaufond Plc AML Policy is designed to ensure that the Company to comply with the requirements and obligations set out in various countries legislation, regulations, rules and guidance for the business, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate any trade and financial crime which sets out the minimum standards in the business.

Beaufond Plc has appointment the Chief of risk management of the company as Money Laundering Reporting Officer (MLRO) who has responsibility for oversight of the company and Business Units compliance with relevant legislation, regulations, rules and industry guidance:

- Establishing and maintaining a Risk Based Approach towards assessing and managing the money laundering risks to the Company;
- Establishing and maintaining risk-based customer due diligence, identification, verification and know your customer (KYC) procedures, including enhanced due diligence for those customers presenting higher risk,
- Establishing and maintaining risk based systems and procedures to monitor ongoing customer activity;
- Procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate;
- Maintenance of appropriate records for the minimum prescribed record-keeping periods;
- Training and awareness for all employees; and
- Provision of appropriate management information and reporting to senior management of the Company's compliance with the requirements.

Beaufond Plc AML Policy once again ensures the transparency of trading and to ensure the prevention of money laundering and other illegal activities.

24.04.2019

CEO & DIRECTOR



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## **I. Definition:**

Anti-money laundering refers to a set of laws, regulations, and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. Though anti-money-laundering (AML) laws cover a relatively limited range of transactions and criminal behaviors, their implications are far-reaching.

Anti-money-laundering laws and regulations target criminal activities including market manipulation, trade in illegal goods, corruption of public funds, and tax evasion, as well as the methods that are used to conceal these crimes and the money derived from them.

## **II. Beaufond Plc AML Policy:**

Beaufond Plc has a zero tolerance policy towards bribery, corruption and anti-money laundering. The company recognizes that these illegal activities including the facilitation of tax evasion have an adverse effect on communities wherever they occur which can threaten laws, democratic processes and basic human freedoms, impoverishing states and distorting free trade and competition.

Anti-money laundering is often associated with organized crime and on occasions the financing of terrorism. In addition, the level and efficacy of the business can be reduced, particularly within economically disadvantaged societies.

Beaufond Plc is committed to applying high standards of honesty and integrity consistently across our global operations, in all their business dealings, of all employees' and of any third party acting on Beaufond Plc behalf.

Beaufond Plc has no appetite for its products or services to be used to facilitate bribery or corruption. Beaufond Plc has developed a robust anti-bribery, corruption and money laundering control framework to manage the legal and regulatory risks faced.

### **AML Policy is part of our Team:**

This AML Policy is a part of and incorporated within, and is to be read along with the User Terms and Conditions (the "Terms").

### **Policy changes:**

The Company changes and updates this AML Policy from time to time as per the policy revision if any by the countries it deals with. Such changes may be made without prior notice, but any changes will only apply to activities and information on a going forward, not retroactive basis. All are encouraged to review this AML Policy whenever they access the on-line Platforms.



### III. Obligations:

#### All the persons / companies deal with Beaufond Plc have to,

- Ensure that it is their duty to ensure compliance with the terms and conditions described in this AML Policy and accord the consent to not using the Trade and Services and the Online Platforms in any manner which results in committing/attempting to commit any criminal offences. It is also agree and consent to any changes made to this Privacy Policy in due course and without notice.
- Ensure that any personal information and/or Identification Documents submitted them is purely belong to them.
- file the details of the persons / company immediately if any changes in the status , the directors, ownership level and address etc., of the company.
- In case anyone is acting on behalf of a juridical person, they must identify the Beneficial Owner and also assist in verification of the identity of such Beneficial Owner and any individual who purports to act on behalf of such juridical person.

### IV. Purpose of the Policy:

In order to mitigate its risks relating to money laundering and other illegal activities, the Company intends to put in place this policy which has the following elements:

- I. Customer Acceptance Terms; and
- II. Risk Management Procedure; and
- III. Customer Verification Procedure; and
- IV. Transaction Monitoring Terms

#### (i) Customer Acceptance Terms:

The Company may either at the time of dealing with the customer or while undertaking any transactions or for any other reason, ensure the compliance with the following:

- Require that a verification process through bank or reliable sources as mandated under this AML Policy;



- Require you to furnish such other details as may be deemed necessary by the Company to verify the identity, if the Company has reason to believe that a person or entity enlisted in the Sanctions Lists.
- Require to submit such additional information and/or data as may be directed by a competent enforcement authority.

The Company may, in its sole discretion, refuse to deal with any new trade accounts, terminate existing trading Accounts after giving due notice, or refuse to process any transactions on the Online Platforms if it is unable to ensure compliance with any of the aforementioned conditions, either due to non-cooperation by the customer or due to the details provided by them being found enlisted on any Sanctions Lists or unreliable or unverifiable to the Company's satisfaction.

### **(II) Risk management Procedure:**

The Company may categorize its customers into low, medium or high risk categories, after undertaking an appropriate risk assessment of each customer based on the following factors (including without limitation):

- Sufficiency and adequacy of identification information submitted or
- Its social and/or financial status; or
- Nature of User's business/vocational activities; or
- Guidance notes and circular issued by various governmental and intergovernmental organizations.

In order to maintain the integrity of the Risk Management Procedure, the Company will keep the risk categorization and any data related thereto confidential. However, the Company may disclose the customers' risk categorization data to the competent enforcement authority if it finds that a particular customer has executed or is likely to execute any Suspicious Transaction.

### **(III) Customer Verification Procedure:**

The Company while undertaking any transactions or for any other reason, may require for the purposes of verification of any customer's identity, following details:

**In case of individuals** - one copy of any Identification Document containing their identity and address details; one recent photograph; any other documents pertaining to business/financial status of such individual as may be prescribed by the Company from time to time;



**In case of companies** – one copy each of the Certificate of Incorporation; Memorandum and Articles of Association; Board resolution authorizing to transact on the Online Platform; Identification Documents containing identification and address details of the individual authorized to transact along with a copy of such authorization document;

**In case of partnership firm/Limited Liability Partnership** – one copy each of the Registration/Incorporation Certificate; partnership deed; Identification Documents containing identification and address details of the individual authorized to transact along with a copy of such authorization document;

Customer must ensure that all copies of aforementioned Identification Documents are duly certified.

For the purposes of verification of any customer's identity, the Company may rely on banks or their own personals or any appropriate and licensed third party service providers to authenticate the Identification and other incidental details provided by the customer

If the Company finds any information obtained in accordance with the procedure described under this Clause to be inadequate, insufficient, or enlisted on the Sanctions Lists, the Company may in its discretion either refuse or terminate (as the case may be) the dealing of with the customer.

#### **IV. Transaction monitoring Term:**

All transactions executed and/or attempted to be executed either physically or on line platform are regularly monitored by the Company, both manually and through use of software based algorithms, in order to promptly identify and highlight certain kinds of transaction including without limitation, the following kinds of transactions:

- High value transactions;
- Cross-border transactions of amounts;
- Suspicious Transactions;

The Company may, from time to time, undertake necessary investigations in order to identify and examine transactions inconsistent with any customer's risk profile specification, and expected usage pattern.

The extent of monitoring shall depend on various factors including upon each User's risk profile.

The Company reserves the right to terminate the customer, restrict and/or prevent access to Online Platforms, or report to the appropriate enforcement authorities the activities of any customer in respect of transactions identified as above.



## **V. Maintenance of Records:**

The Company will maintain and preserve the following information and/or data:

- Records of all transactions executed for a period of at least 8 (eight) years from the date of each transaction.
- Records of all transactions identified under Clause (iv) (Transaction Monitoring Terms) above for a period of at least 10 (Ten) years, including but not limited to the information about the nature, value and parties to such transactions, and their date of remittance.
- Identification records of the customers (including but not limited to the Identification Documents submitted pursuant to Clause (iii) (Customer Verification Procedure-above), during the subsistence of and for a period of at least 10 (Ten) years from the date of termination of such customer Account.

## **VI. Compliance, Disclosure and Notice:**

The Company may share, from time to time, information regarding transactions identified under Clause (IV) (Transaction Monitoring Terms), identification information of such customers, or any other information mandated under the applicable law, with the appropriate enforcement authorities.

In order to improve the integrity and transparency of transactions on the online Platforms, the customers are encouraged to report any information that are privy to or become privy to in the future regarding any Suspicious Transactions or transactions that have find or have reason to believe are dubious in nature, to our Compliance Officers by writing to them.

In order to ensure compliance with this AML Policy and/or the applicable laws, the Company may be required to send notices from time to time to the customers. All such notices will be sent to such address as provided by them under Clause (iii) (Customer Verification Procedure) of this AML Policy. Where they are required to share any information according to the procedures contained in this AML Policy, such communication may be made by them electronically by sending an email to the company.

## **VII. Governance & Conformance**

Regular reviews of the effectiveness of this Policy are carried out in addition to audits periodically undertaken by the company Internal Audit function. This provides senior executive management oversight committees and the Board Audit Committee with the necessary assurance regarding the operating effectiveness of the company's controls.

All of Beaufond Plc's Policies are supported and endorsed by the Board of Directors and apply to all business dealings globally. All employees receive training on the financial crime Policies at least once a year, with more detailed and advanced training for those whose roles involve heightened risks.

Beaufond Plc ensures that failure to comply with the policies may give rise to disciplinary action, up to and including dismissal.