



eXcentral

Anti-Money Laundering Policy

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1. INTRODUCTION

By accepting this Anti-Money Laundering Policy, you acknowledge and confirm that our official legally binding language is English. In the event of any discrepancy or inconsistency between any documentation, information and communications in any other language other than English, the English documentation, information and communications shall prevail.

Mount Nico Corp Ltd (hereinafter referred to as ‘eXcentral’ or the ‘Company’) is registered in Cyprus under the Companies Law, with registration number HE307717. The Company’s business address is located at Agiou Athanasiou, 66 TOUMAZIS LINOPETRA BUILDING 4102, Limassol, Cyprus. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”) as a Cyprus Investment Firm (CIF) to offer certain Investment and Ancillary Services and under the Investment Services and Activities and Regulated Markets Law of 2017 (L87(I)/2017) (the “Law”), which has transposed Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments (the “MiFID II Directive”) into national law, with CIF license number 226/14.

Additionally, eXcentral carries out its activities in line with Directive (EU) 2018/1673 of the European Parliament and of the Council of 23 October 2018 on combating money laundering by criminal law, Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU (Text with EEA relevance), Council Directive (EU) 2016/2258 of 6 December 2016 amending Directive 2011/16/EU as regards access to anti-money-laundering information by tax authorities, Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC (Text with EEA relevance) and the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007-2018, Law No. 188(I)/2007.

Furthermore, eXcentral is operating in line with the FATF Recommendations. The “Financial Action Task Force” (“FATF”) set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. Starting with its own members, the FATF monitors countries’ progress in implementing the FATF Recommendations; reviews money laundering and terrorist financing techniques and counter-measures; and, promotes the adoption and implementation of the FATF Recommendations globally.



2. eXcentral AML POLICY

At eXcentral we are devoted in preventing money laundering activities and identifying suspicious transactions, therefore we have implemented the following measures in order to comply with our regulatory requirements:

- Verifying our client’s identity and place of residence;
- Identifying, monitoring and reporting any kind of suspicious transactions;
- Keeping documents and records for at least 5 years after the termination of the business relationships with our clients;
- Continuous training of our staff to recognize suspicious transactions, fulfill all reporting obligations and keep up to date with the AML regulatory requirement;
- Depending on client location, report any suspicious activities to authorities in several countries.

In addition to the abovementioned eXcentral:

- Collects, verifies and updates at least annually the personal identification information of all account holders.
- Tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.
- The general practice of the Company is not to accept any third-party deposits, although exceptions may apply, from time to time, under certain circumstances and subject to the agreement of the provision of further due diligence documents to be provided to the Company, in order to verify the source of funds and wealth of the third-party deposits Matches each deposit to the account name held on file for that customer.
- Monitors funding from bank accounts held outside the account holder's home country.
- Reserves the right to refuse to process a transaction where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, eXcentral is under no obligation to inform the client when suspicious activity is reported to any corresponding regulatory or legal bodies.

! All eXcentral client funds are held in separate, segregated accounts that are designated solely for client deposits and withdrawals.



3. ACCOUNT OPENING PROCEDURES - KNOW YOUR CUSTOMER POLICY (“KYC”)

Account Opening Requirements

In order to open a trading account with eXcentral, the potential client must have a permanent residence in a country within the European Economic Area (EEA) and be over 18 years old. In addition, the steps listed below must be followed:

- complete the account opening application, which includes providing personal information (name, date of birth, etc), information relating to his/her economic profile (annual income, estimated net worth, employment status, etc.)
- complete the appropriateness test
- provide identification documents which consist of a valid form of government-issued identification and a proof of residence

! Please note that from the day of receipt of the account opening application a timeframe of 15 days is given to provide the required information and documentation. If the potential client fails to provide these within the aforementioned timeframe, the Company will decline the application and in case of any deposits, will refund the available balance back to the method used to deposit the funds. The returned funds (deposits) include any profits the Client has gained during the fifteen days period and deducting any losses incurred.

In the event the Client has not provided the Company with the required verification documents within fifteen (15) days from the date of registration of his/her/their Trading Account(s) (i.e. the acceptance of the present Client Agreement), the Company reserves the right to perform an electronic verification, using the personal information provided on the Client Questionnaire during the onboarding process. When Clients are verified by the performance of an Electronic Verification, they shall be informed accordingly through an email within a timely manner.

Identification Documents:

1. Proof of Identity

Following documents are accepted as a Proof of Identity:

- A valid Passport
- A valid National Identity Card

The document must be issued on your name and all information on the document including your photo must be visible.

! Please keep in mind that your Proof of Identity must be updated once the document expires.

! All photo IDs are verified through a third-party compliance software.

The Company reserves the right to ask for certified true copies of the abovementioned documents.



2. Proof of Residence

Following documents are accepted as a Proof of Residence:

- A utility or phone bill
- A bank statement
- Governmental documents such as tax bill or residence certificate (stamped)

Please note that your proof of residence document must be recent (not older than 6 months), show your name, permanent address and date of issue.

! Please keep in mind that your Proof of Residence must be updated at least once per year.

The Company reserves the right to ask for certified true copies of the abovementioned documents.

Additionally, the company reserves the right to request additional documents from its clients whenever it deems necessary.

4. BANK ACCOUNT REQUIREMENTS

eXcentral account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

5. FUNDS WITHDRAWAL PROCEDURE

The withdrawal procedure at eXcentral detailed below follows strict principles to ensure that the funds are sent back to their originating source.

- a. eXcentral customers must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.
- b. The withdrawal form must be submitted to the eXcentral Finance department for processing. The Finance department will do the following:
 - confirm the account balance
 - confirm that the account is approved and the provided documents are up-to-date.
 - verify that there are no holds or withdrawal restrictions on the account
 - verify that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file
 - examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity
 - verify the bank account details held on file



- c. If there is no mismatch or suspicious activity the Finance Department will approve the withdrawal, and the funds are released to the client.
- d. In the event that the Finance Department believes there was suspicious activity on the account, the eXcentral Anti-Money Laundering Compliance Officer (AMLCO) will be informed, in order to perform further investigation.
- e. If the withdrawal will be flagged for suspicious activity by the eXcentral AMLCO, the withdrawal is placed on hold, and send to the eXcentral Management.
- f. eXcentral Management along with the eXcentral AMLCO will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

! Please note that your trading account must be verified in order for the withdrawal to be processed.

6. COMPLIANCE FOOTNOTE

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the eXcentral Compliance Team. A detailed copy of our Compliance Policy is available for qualified institutions, regulatory bodies and related counterparties.

No substitutions or modifications will be accepted to the requirements above. The eXcentral Compliance Department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in

- a. the country of incorporation of the Company, i.e. the Republic of Cyprus;
- b. the country of origin of any funds transmitted to eXcentral; and
- c. the destination country of any funds refunded by or withdrawn from the Company.

eXcentral does not wish to enter into a business relationship if the funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Anti Money Laundering Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy only but is not part of our Terms and Conditions of Business and is not intended to be contractually binding.

For additional questions concerning eXcentral policies, please contact our Compliance Department:

Email: compliance@mntico.com

Attn. Compliance Department, Mount Nico Corp Ltd, registration number HE307717

Address: Agiou Athanasiou, 66 TOUMAZIS LINOPETRA BUILDING 4102, Limassol, Cyprus



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