

1. INTRODUCTION

Fintana Trading Ltd (hereinafter referred to as "**Fintana**" or the "**Company**") is a licensed financial services provider registered in Mauritius, with registration number 197666 GBC. Our registered address is 6th Floor, Tower 1, Nexteracom Building, Ebene, Mauritius. The Company is regulated by the Financial Services Commission ("**FSC**") of Mauritius and holds both an Investment Dealer License and a Global Business License (License Number GB23201338).

This AML Policy is designed to ensure compliance with all applicable Anti-Money Laundering laws in Mauritius, including the Financial Intelligence and Anti-Money Laundering Act ("**FIAMLA**") 2002 and its regulations as amended from time to time. The Company is committed to combating money laundering ("**ML**") and the financing of terrorism ("**CFT**") through the implementation of robust internal controls and adherence to guidelines issued by the FSC of Mauritius, the Financial Intelligence Unit ("**FIU**"), and other relevant authorities.

Fintana aligns its operations with the recommendations of the Financial Action Task Force ("**FATF**"), which provides a framework for jurisdictions and entities to effectively prevent and combat ML and CFT risks.

2. OVERVIEW OF REGULATORY FRAMEWORK

AML/CFT Laws and Regulations:

- Anti-Money Laundering and Countering the Finance of Terrorism Act 2020
- Anti-Money Laundering and Countering the Finance of Terrorism Regulations 2020 (and subsequent amendments)
- Relevant guidance notes issued by the FSC and FIU.

Counter-Terrorism Financing Laws and Regulations:

- Prevention of Terrorism Act 2004
- Relevant amendments and regulations pertaining to the prevention of terrorism and proliferation financing.

International Standards:

Fintana adheres to the following international guidelines:

- FATF Recommendations
- IOSCO Principles
- Sanctions lists from the EU, US, and UN.

Beneficial Ownership Regulations:

- Beneficial Ownership Act 2020
- Beneficial Ownership Regulations 2020 (and amendments).

3. ADMINISTRATIVE & CRIMINAL OFFENCES

The Company recognizes the serious implications of money laundering and associated offences. Legal penalties for non-compliance include substantial fines and imprisonment for both natural and legal persons, as outlined in the applicable legislation.

4. AML/CTF REGULATORY OBLIGATIONS

Fintana is committed to maintaining its integrity and reputation by implementing effective measures to prevent ML and CFT. This includes:

- Comprehensive systems for client identification, monitoring, and reporting of suspicious activities.
- Retention of records for a minimum of seven years post-termination of any business relationship.
- Regular employee training on AML/CTF policies and procedures, including the reporting of Suspicious Transaction Reports (“**STRs**”) and Suspicious Activity Reports (“**SARs**”).

Client Acceptance & Onboarding

The Company does to offer its services to residents in the USA, Canada, Russia, Belarus, Iran, Iraq, North Korea, European Union, the United Kingdom or to any other jurisdiction where such distribution would be contrary to the local laws and regulations.

Furthermore, the Company does not engage with, onboard, or provide services to individuals who are under the age of eighteen (18) years, or who are otherwise not legally eligible to enter into binding contractual agreements under the laws of their country of residence.

Considering the afore-mentioned restrictions, the Company reserves the right to evaluate, at its sole discretion and on a case-by-case basis, the possibility of onboarding individuals who are residents within the European Union. Such assessments will only be considered if the prospective client has independently and proactively initiated contact with the Company, without any form of solicitation, advertisement, or promotional effort on the part of the Company.

The onboarding process initiates with the completion of the Company’s dedicated client questionnaire which includes questions about personal information (full name, date of birth, residential address, nationality etc.), information relating to the financial and employment status, trading objectives, etc.

Upon finalization of registration and completing client questionnaire the client is required to provide the following due diligence documentation:

1. Governmental Issued Identification Document (POI):

- **Copy of a valid Passport**
- **Copy of a valid National ID (both back and front sides)**
- **Copy of a valid Driving License (both back and front sides)**

2. Proof of Residence (POR):

- **Utility Bill (issued within the last six (6) months upon registration)**
- **Bank Statement (issued within the last six (6) months upon registration)**
- **Tax declarations, residency certificates, tax bills and any other governmental issued document.**

The above is not an exhaustive list of required documentation during the onboarding, as the Company reserves the right to request any additional information to finalize the client verification process.

Risk Assessment and Client Screening

Fintana utilizes an internal risk-based approach for client onboarding and ongoing monitoring, by considering the following risk factors:

1. Geographical Jurisdiction
2. Customer Behavior
3. Product Delivery Channel
4. Transactional activity

Upon completion of the client questionnaire, the Company is in a position to construct the Client's economic profile which will indicate the risk classification of each client (high, medium or low) and consequently, the degree of due diligence that should be conducted (simple or enhanced).

The Company uses screening tools to identify potential risks associated with clients, particularly in respect to Individuals with criminal backgrounds or sanctions, or Politically Exposed Persons ("**PEPs**") and their associates.

It is at the Company's sole discretion to apply enhanced due diligence on potentially high-risk clients which will be assessed on a case-by-case basis.

Reporting Obligations and Retention

Fintana is legally obliged to report any suspicious transactions to the appropriate authorities, ensuring compliance with local and international regulations. The Company retains the right to refuse processing of transactions where there is suspicion of ML or terrorism financing.

All information related to clients and transactions must be made available to the relevant authorities upon request, and be kept in records for at least seven (7) years following the termination of the business relationship between the Company and the respective client.

5. POLICY REVIEW AND UPDATES

The Company reserves the right to review, assess, and update this Policy, in its sole discretion, whenever it is deemed necessary. The Client is responsible for visiting the Company's website legal section for any further updates on its terms and conditions.

For any further inquiries on the policy, you can send an email to the Relevant Department at: support@fintana.com