

BYFX Global Co. LTD

Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) Policy

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BYFX Global is committed to maintain a globally-compliant Anti-money Laundering (“AML”) and Counter Terrorist Financing “CTF” standard. The BYFX AML/CTF policy set forth herein the implementation of procedures and robust compliance framework to comply with International standards of anti-money laundering and counter-terrorist financing which were set by Financial Action Task Force (“FATF”), which aim to encompass the requirements regarding customer due diligence, record keeping and reporting of suspicious transaction.

BYFX Global employs comprehensive AML system to detect and prevent illicit transactions. With advanced KYC functionality, BYFX Global compliance framework integrates internal monitoring with industry recognized third-party provider for effective due diligence and preventative measures for risk-based assessment on sanctioned or politically exposed persons (PEPs) with object to prevent potential misuse of platform that could be associated with laundering activity.

The AML Policy sets out the minimum standards which must be complied with and includes:

- To appoint a Money Laundering Reporting Officer (“MLRO”) with sufficient level of seniority and independence to oversight business compliance in accordance with relevant regulatory legislation, rules and industry guideline
- To adopt risk-based approach (“RBA”) to customer due diligence (“CDD”) and on-going monitoring
- To conduct appropriate due diligence procedures to i) identify, ii) verify and iii) adequately document the identity of prospective customer before conduct of business, include but not limited to the nature of business and the source of funds.
- To establish procedures for reporting suspicious activity in accordance with KYC procedure and applicable laws internally and to regulatory authorities as appropriate
- To keep appropriate customer due diligence and transaction records
- To keep employees abreast of latest update of international AML and CTF practice

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