

Anti-Money Laundering (AML) Policy for FITRADE PARTNERS INTERNATIONAL LTD

Company Number: 13790130

Effective Date: [Insert Effective Date]

1. Introduction

FITRADE PARTNERS INTERNATIONAL LTD ("we," "us," or "our") is committed to the highest standards of anti-money laundering (AML) and combating the financing of terrorism (CFT) compliance. This AML Policy outlines our commitment to preventing our services from being used for money laundering or terrorist financing activities and ensuring compliance with all applicable laws and regulations.

2. Purpose

The purpose of this policy is to:

- Establish and maintain an AML and CFT framework.
- Ensure compliance with relevant laws, regulations, and guidelines.
- Provide clear guidance for the identification and reporting of suspicious activities.
- Protect the integrity of the financial system and our business.

3. Scope

This policy applies to all employees, directors, officers, and agents of FITRADE PARTNERS INTERNATIONAL LTD. It covers all products and services offered by our company.

4. AML Compliance Officer

We have appointed an AML Compliance Officer who is responsible for:

- Overseeing and implementing this AML Policy.
- Ensuring that the company complies with all AML and CFT regulations.
- Reporting suspicious activities to the relevant authorities.
- Providing training and resources to employees on AML and CFT requirements.

5. Customer Due Diligence (CDD)

We will conduct Customer Due Diligence (CDD) measures to verify the identity of our customers. CDD measures include:

- **Identifying the customer and verifying their identity** using reliable, independent source documents, data, or information (e.g., passports, national ID cards).
- **Identifying the beneficial owner** of the customer and taking reasonable measures to verify their identity.

- **Understanding the nature and purpose** of the customer relationship to develop a risk profile.
- **Ongoing monitoring** of customer transactions to ensure that they are consistent with the customer's risk profile and source of funds.

6. Enhanced Due Diligence (EDD)

Enhanced Due Diligence (EDD) will be applied to higher-risk customers, including but not limited to:

- Politically Exposed Persons (PEPs).
- Customers from high-risk jurisdictions.
- Complex business structures.

EDD measures include obtaining additional information about the customer and the intended nature of the business relationship, as well as more rigorous monitoring of the relationship.

7. Record Keeping

We will maintain records of all CDD information, transactions, and reports of suspicious activities for a minimum of [insert number] years, or longer if required by applicable laws and regulations. These records will be securely stored and readily available to competent authorities upon request.

8. Reporting Suspicious Activities

All employees are required to report any suspicious activities to the AML Compliance Officer without delay. The AML Compliance Officer will review and, if appropriate, file a Suspicious Activity Report (SAR) with the relevant authorities.

9. Training and Awareness

We will provide regular AML and CFT training to all employees to ensure they understand their responsibilities under this policy. Training will include:

- Recognizing and reporting suspicious activities.
- Customer identification and verification procedures.
- Record-keeping requirements.
- Legal and regulatory obligations.

10. Internal Controls and Audit

We will implement and maintain internal controls and procedures to ensure compliance with this policy and relevant laws and regulations. Regular audits will be conducted to assess the effectiveness of our AML and CFT measures and to identify areas for improvement.

11. Review and Updates

This policy will be reviewed and updated regularly to ensure it remains effective and compliant with current laws and regulations. Any changes to this policy will be communicated to all employees.

12. Contact Information

For any questions or concerns regarding this AML Policy, please contact:

FITRADE PARTNERS INTERNATIONAL LTD