

AML POLICY

VPFX CAPITAL MARKETS LTD

www.vpcapitalmarkets.com



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1. INTRODUCTION

1. This Anti-Money Laundering (AML) policy is established by VPFX CAPITAL MARKETS LTD., a Forex and CFD broker house registered in Saint Lucia (hereinafter referred to as “the Company”). This policy aims to outline the procedures, responsibilities, and safeguards in place to prevent money laundering and terrorist financing activities as required by the regulatory authorities in both jurisdictions. This Anti-Money Laundering (AML) policy outlines the measures, procedures, and controls to prevent and detect illicit activities within our operations.

2. LEGAL FRAMEWORK

1. The Company is registered in Saint Lucia under the provision of International Companies Act, Cap 12.14 – Section 6. The Company acknowledges and strictly adheres to all AML and counter-terrorist financing (CTF) laws, regulations, and guidelines applicable in the jurisdiction.
2. The AML policy is consistent with the Financial Action Task Force (FATF) recommendations and Saint Lucia AML/CFT regulations.

3. RISK ASSESSMENT

1. The Company conducts periodic risk assessments to identify and assess the risks of money laundering and terrorist financing associated with its business activities, products, services, and customer base. These assessments will be updated based on changes in the Company’s operations or external factors.

4. CUSTOMER DUE DILIGENCE (CDD)

1. The Company employs a robust and comprehensive KYC process for all customers, including individuals and entities, before establishing a business relationship. The KYC process includes the following:
 - a. The company uses an internationally trusted companies such as REFINITIV for KYC verification.
 - b. Verification of identity, including name, date of birth, nationality, and residential address.
 - c. Verification of the customer’s source of funds and wealth.
 - d. Identifying and verifying the identity of customers and beneficial owners.
 - e. Enhanced due diligence (EDD) for higher-risk customers.
 - f. The Company will continuously monitor customer transactions, account activity, and other relevant information to identify unusual or suspicious patterns that may indicate money laundering or terrorist financing.
 - g. Conducting sanctions and politically exposed person (PEP) checks using an automated sanction scanner.
 - h. Documenting and retaining customer information and transaction records.

2. The Company will not establish a business relationship or conduct transactions with customers who refuse to provide the required identification or information.
3. Enhanced Due Diligence (EDD) measures shall be applied to customers with higher-risk profiles, including politically exposed persons (PEPs).

5. REPORTING AND RECORD-KEEPING

1. The Company will maintain accurate and up-to-date records of customer transactions and identification information for a minimum of five years after the termination of the customer relationship.
2. The Company maintains comprehensive records of all customer information, transactions, and reports of suspicious activities. These records will be kept for the legally mandated retention periods.
3. Suspicious transactions or activities will be promptly reported to the relevant authorities as required by law.
4. Employees must promptly report suspicious activity or transactions to the designated AML Officer.
5. The AML Officer shall conduct an initial review of the reported activity and, if necessary, escalate it to the appropriate authorities per the regulatory requirements.

6. STAFF TRAINING AND AWARENESS

1. All employees, agents, and introducer brokers (IB)s of the Company will undergo AML training on a regular basis to ensure they are aware of AML/CFT risks and procedures to ensure they are aware of their responsibilities and updated on current AML laws and regulations.

7. INTERNAL CONTROLS

1. The Company will establish and maintain internal controls to prevent and detect money laundering and terrorist financing.

8. COMPLIANCE OFFICER

1. A designated Compliance Officer will oversee and ensure the effectiveness of the AML program.

9. SANCTIONS AND PEP SCREENING

1. The Company utilizes an automated sanctions screening system to check customers and transactions against relevant international sanctions lists and watchlists. Any matches will be reviewed and reported in accordance with regulatory obligations.
2. The Company will conduct sanctions and PEP screening on a continuous basis using an automated sanction scanner to identify and mitigate potential risks.

10. REPORTING AND COOPERATION

1. The Company will cooperate fully with law enforcement agencies and regulatory authorities in any investigations related to money laundering or terrorist financing.
2. The Company will submit all required reports and documentation to the relevant regulatory authorities as local laws and regulations mandate.

11. REVIEW AND UPDATES

1. This AML policy will be reviewed and updated annually, or as necessary, to reflect changes in regulations, industry best practices, and the Company's operations or to ensure its effectiveness and compliance with evolving laws and regulations.

12. PENALTIES FOR NON-COMPLIANCE

1. Non-compliance with this AML policy may result in disciplinary actions and legal consequences. The Company is committed to cooperating fully with law enforcement agencies in case of any investigation.

13. CONCLUSION

1. The Company is committed to maintaining its operations' highest AML compliance and integrity standards. We will continue to evolve and strengthen our AML program to meet regulatory requirements and protect our business from illicit activities.
2. This AML policy is fundamental to the Company's commitment to maintaining its operations' highest ethical and legal standards. All employees and stakeholders are expected to comply with this policy and contribute to the prevention of money laundering and terrorist financing activities.
3. This AML policy should be accompanied by specific operational procedures, reporting forms, and training materials to ensure its effective implementation. Additionally, the Company should consult with regulatory authorities in Saint Lucia to ensure full compliance with local AML/CFT regulations and tailor this policy to meet specific requirements. VPFX Capital Markets Ltd. shall be governed by, construed and enforced in all respects by the laws of Saint Lucia.



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