

AML POLICY
SEPTEMBER 2018

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Squared Financial (CY) Limited (ex. Aspide Financial Ltd. and hereinafter “the Company”)) is dedicated to maintain the highest standards of Anti-Money Laundering (AML) compliance and Anti-Terrorist Financing Policies. All members of staff are trained in these matters.

Money Laundering occurs in 3 stages: Placement, Layering and Integration. The purpose of this is to convert money from illegal activities (e.g. corruption, fraud, terrorism) into money which looks like it comes from a legitimate source. Our goal as a company is to detect any suspicious actions and prevent the facilitation of such actions.

The policies we have in place include:

- Ensuring we follow strict KYC (Know your client) procedures. For example, all clients have to provide a valid proof of identification and a valid proof of residence. For corporate clients, additional corporate documents are obtained. Please note that additional documents can be requested at all times.
- Identifying the true beneficiary's identity from a reliable and independent source
- Due Diligence and Enhanced Due Diligence procedures are adhered to.
- Maintaining records.
- Determining that clients are not known or suspected criminals/terrorists by checking their identity against a database.
- Monitoring clients' transactions.
- Monitoring the country of origin and destination of Clients' funds.
- Monitoring the nature of business transactions.
- Economic profiling of the client.
- The non-acceptance of cash deposits.
- The strict deposit and withdrawal policy.

The Compliance Department within the Company is looking to International Anti-Money Laundering requirements on an ongoing basis. As an Investment Firm, we recognize our responsibility on such matters and our aim is the recognition and reporting of suspicious transactions.