



Anti-Money Laundering Statement

Money laundering is the act of converting money or other monetary instruments gained from illegal activity into money or investments that appear to be legitimate so that its illegal source cannot be traced. Domestic and international laws apply to companies whose customers can deposit and withdraw funds from their accounts.

Kavana FX strictly follows the provisions of the anti-money laundering and counter-terrorism financing policy and demands that its employees fully observe these standards. The Company therefore takes all necessary measures to detect and counter money laundering and terrorism financing. The internal rules are observed in accordance with relevant international requirements.

Implemented Procedures

The objective of the Anti-Money laundering procedures that Kavana FX implements are to ensure that customers engaging in certain activities are identified to a reasonable standard while minimising the compliance burden and impact on legitimate customers. Kavana FX is committed to assisting governments in combating the threat of money laundering and financing terrorist activities around the world. For that purpose, Kavana FX has set up a highly sophisticated electronic system. This system documents and verifies client identification records and tracks and maintains detailed records of all transactions.

Kavana FX carefully tracks suspicious and significant transaction activities and reports such activities, "providing timely and comprehensive information" to law enforcement bodies. To uphold the integrity of reporting systems and to safeguard businesses, the legislative framework provides legal protection for providers of such information.

In order to minimise the risk of money laundering and financing terrorist activities, Kavana FX neither accepts cash deposits nor disburses cash under any circumstances. Kavana FX reserves the right to refuse to process a transfer at any stage where it believes the transfer to be connected in any way to money laundering or criminal activity. It is forbidden for Kavana FX to inform customers that they have been reported for suspicious activity.

Identification

For the purpose of complying with Anti-Money laundering laws, Kavana FX requires two different documents to verify the identity of the customer. The first document we require is a legal, government-issued, identifying document with a picture of the customer. It may be a government-issued passport, driver's licence (for countries where the driver's licence is a primary identification document) or local ID card (no company access cards). The second document we require is a bill with the customer's name and actual address issued three months ago at the earliest. It may be a utility bill, a bank statement, an affidavit, or any other document with the customer's name and address from an internationally recognized organisation.

To make deposits using a bank card, clients must submit full-size colour copies of the front and back sides of their bank cards within two days. Should a client refuse to provide such copies in time, his/her trading account will be blocked, and money will be returned to the card. The front side of the bank card must feature the first six and last four digits of the card number, as well as the holder's name and the expiry date. The back of the card must be signed. The CVV code must be covered. According

to VISA and MasterCard rules, the holder's signature must be located in the signature field on the back of the card. If a card doesn't have the holder's name or a virtual card is used, clients are required to provide a screenshot of their profile with a bank or a bank statement that shows the card number and the holder's name.

To change the Client's profile's phone number, the Client must provide a document confirming ownership of a new phone number (agreement with a mobile phone service provider) and a photo of the ID held beside the Client's face. The Client's personal data shall be the same in both documents.

Clients are required to submit up-to-date identification and contact information on time as soon as changes occur.

Documents in non-western letters must be translated into English by an official translator; the translation must be stamped and signed by the translator and sent together with the original document with a clear picture of the customer.

Politically exposed person identification

The client undertakes to declare their PEP (politically exposed person) status by ticking the appropriate field in the Verification section of their Client Profile and providing copies of documents confirming such status and indicating the origin of funds used to make a deposit. A politically exposed person means a natural person who is or who has been entrusted with prominent public functions and includes the following:

- (a) Heads of State, heads of government, ministers, and deputy or assistant ministers;
- (b) Members of parliament or similar legislative bodies;
- (c) Members of the governing bodies of political parties;
- (d) Members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances;
- (e) Members of courts of auditors or the boards of central banks;
- (f) Ambassadors, chargés d'affaires and high-ranking officers in the armed forces;
- (g) Members of the administrative, management or supervisory bodies of State-owned enterprises;
- (h) Directors, deputy directors and members of the board or equivalent functions;
- (i) Mayors

No public function referred to in points (a) to (i) shall be understood as covering middle-ranking or more junior officials.

Family members include the following:

- (a) The spouse, or a person considered to be equivalent to a spouse, of a politically exposed person;
- (b) The children and their spouses, or persons considered to be equivalent to a spouse of a politically exposed person;
- (c) A politically exposed person's parent.

Persons known to be close associates means:

- (a) natural persons who are known to have joint beneficial ownership of legal entities or legal arrangements, or any other close business relations, with a politically exposed person;
- (b) natural persons who have sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the de facto benefit of a politically exposed person.
- (c) The Company is legally obliged to refuse service and return money if a politically exposed person (PEP) fails to provide documents explaining the origin of deposit funds. The Company undertakes to repeat the identification of PEP statuses that have been confirmed every year to update the data.

Payment Policy: Deposits and Withdrawals

Please be aware that chargebacks to the Skrill payment system and bank cards are prohibited. To make a withdrawal from a trading account to one of these systems, it is necessary to submit an application through the Client's Profile. Money will be loaded into the wallet within three business days. If money has been lost when trading, it cannot be reimbursed by means of a chargeback. Please read the risk disclosure before you start trading.

Kavana FX requires all deposits from the sender whose name matches the customer's name in the Company's records. Third-party payments are not accepted.

As for withdrawals, money may be withdrawn from the same account in the same way it was received. For withdrawals where the name of the recipient is present, the name must exactly match the name of the customer in our records. If the deposit was made by wire transfer, funds may be withdrawn only by wire transfer to the same bank and to the same account from which it originated. If the deposit was made by means of electronic currency transfer, funds may be withdrawn only by means of electronic currency transfer through the same system and to the same account from which it originated.

the Company accepts deposits in the following currencies: USD, EUR, CHF, AED, RUB, and TRY. To comply with the AML procedures, funds withdrawals have to be made solely in the same currency that was used to make a deposit.

If you have any inquiries, please contact us via e-mail.

