Regulated by the Cyprus Securities and Exchange Commission (Licence No. 215/13)

TF GLOBAL MARKETS (EUROPE) LTD

Anti-Money Laundering Policy

Document	Anti-Money Laundering Policy
Entity	TF Global Markets (Europe) Ltd
Regulator	Cyprus Securities and Exchange Commission (CySEC)
Licence number	CIF 215/13

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ANTI-MONEY LAUNDERING POLICY

1. Introduction

TF Global Markets (Europe) Ltd (hereinafter, the "Company", "ThinkMarkets", "we", "us") collects and verifies the personal identification data of our account holders, while logging and tracking itemized statements of all the transactions that are carried out by our Clients. Prior to opening an account with TF Global Markets (Europe) Ltd a valid form of government-issued identification (such as International Passport, National Identity Card), a recent proof of residence, and bank account information is required, along with your completed account application. Additionally, TF Global Markets (Europe) Ltd tracks all suspicious transactions of our Clients, and transactions executed under non-standard trading conditions.

- All TF Global Markets (Europe) Ltd Client funds are held in separate, segregated accounts that are designated only for Client deposits and withdrawals.
- TF Global Markets (Europe) Ltd monitors funding from various bank accounts outside of the account holder's home country.
- TF Global Markets (Europe) Ltd performs its actions on the basis of the anti-money laundering framework set forth by the Financial Action Task Force.
- TF Global Markets (Europe) Ltd neither accepts cash deposits nor disburses cash under any circumstances.
- TF Global Markets (Europe) Ltd does not accept third-party deposits of any kind.
- TF Global Markets (Europe) Ltd matches each deposit to the account name on file for that Client.
- TF Global Markets (Europe) Ltd reserves the right to refuse processing a transaction at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity.

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2. Account Opening Procedures – Know your Customer Policy (KYC)

Prior to opening an account, TF Global Markets (Europe) Ltd shall receive and document, inter alia, the identity, nature of business, income, source of assets, information to construct the economic profile, knowledge and experience and investment objectives of each prospective Client.

The Company currently on-boards Clients from the European Union.

Account Opening Requirements and Framework:

Photo ID -The following are acceptable forms of photo identification:

- A valid international passport
- A valid National Identity Card

**Please note that all photo IDs are verified through third-party compliance software.*

Proof of Residence - The following are acceptable forms of proof of residence:

- A recent utility or phone bill, or a bank statement
- All proof of residences must be current and not outdated by more than 6 months

Bank Account Requirements

- All TF Global Markets (Europe) Ltd account holders must have a valid bank or credit card account in their name
- The bank statement should show their name and the same registered address as their application

Funds Withdrawal Procedures

The withdrawal process at TF Global Markets (Europe) Ltd detailed below, is structured around strict guidelines to make sure that funds are securely sent back to their originating source.

- TF Global Markets (Europe) Ltd Clients must complete a signed paper or digital withdrawal request containing their correct account information.
- The withdrawal form is submitted to the TF Global Markets (Europe) Ltd Finance department for processing. The Finance department confirms the account balance, verifies that there are no holds or withdrawal restrictions on the account, and then approves the withdrawal request, pending approval by the Treasury team.
- The TF Global Markets (Europe) Ltd Finance team reviews all withdrawal requests, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file. The Finance team also examines the withdrawal request against the Client's deposit history to make sure there is no suspicious activity and verifies the bank account on file.
- Once Withdrawal requests are approved, the funds are released to the Client.
- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by TF Global Markets (Europe) Ltd management staff.
- TF Global Markets (Europe) Ltd Management partners with the Finance team to see if further action needed and which, if any, relevant regulatory bodies need to be contacted.

Compliance Summary

The compliance procedures listed above are only brief synopsis of the high-level guidelines observed by the TF Global Markets (Europe) Ltd compliance team. A detailed copy of our AML policy is available for qualified institutions, regulatory bodies, and related counterparts. For additional questions concerning TF Global Markets (Europe) Ltd policies, please feel free to contact our Compliance department (compliance.eu@thinkmarkets.com). No substitutions or modifications will be accepted to the above requirements, TF Global Markets (Europe) Ltd Compliance department reserves the final determination regarding the validity of the documents.