



Anti-Money Laundering Policy

December 2023

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ThinkMarkets 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 ThinkMarkets a valid form of government-issued identification (Driver's License, State ID, or Passport), a proof of residence, and bank account information is required, along with your completed account application. Additionally, ThinkMarkets tracks all suspicious transactions of our clients, and transactions executed under non-standard trading conditions.

- ThinkMarkets monitors funding from various bank accounts outside of the account holder's home country.
- ThinkMarkets performs its actions on the basis of the anti-money laundering framework set forth by the [Financial Action Task Force](#).
- ThinkMarkets neither accepts cash deposits nor disburses cash under any circumstances.
- ThinkMarkets does not accept third-party deposits of any kind.
- ThinkMarkets matches each deposit to the account name on file for that customer.
- ThinkMarkets 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. In accordance with international law, ThinkMarkets is not obligated to inform the client if suspicious activity is reported to any corresponding regulatory or legal bodies.

Funds Withdrawal Procedures

The withdrawal process at ThinkMarkets detailed below, is structured around strict guidelines to make sure that funds are securely sent back to their originating source.

- ThinkMarkets customers must complete a signed paper or digital withdrawal request containing their correct account information.
- The withdrawal form is submitted to the ThinkMarkets Accounting department for processing. The Accounting 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 ThinkMarkets treasury team reviews all withdrawal requests approved by the Accounting department, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file. The treasury team also examines the withdrawal request against the customer's deposit history to make sure there is no suspicious activity, and verifies the bank account on file.
- Withdrawal requests approved by the ThinkMarkets treasury department are sent back to the accounting department, and 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 ThinkMarkets management staff.
- ThinkMarkets Management partners with the treasury 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 ThinkMarkets compliance team. A detailed copy of our compliance policy is available for qualified institutions, regulatory bodies, and related counterparts. For additional questions concerning ThinkMarkets policies, please feel free to contact our [Compliance](#) department. No substitutions or modifications will be accepted to the above requirements, ThinkMarkets Compliance department reserves the final determination regarding the validity of the documents.

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