**Anti-Money Laundering (AML) Policy**

The purpose of this Anti-Money Laundering (AML) Policy of **Globus Trading Inc,** company Number: HT00324021, P.B. 1257 Bonovo Road, Fomboni, Comoros, KM, Brokerage License Number: BFX2024059 (“**The Company**”) is to ensure that Globus Trading Inc. operates in compliance with anti-money laundering and counter-terrorist financing laws and regulations. The objective of this policy is to safeguard the company from being exploited for illicit activities, uphold international financial standards, and protect the company’s reputation by promoting a culture of compliance and ethical conduct.

This policy is developed in alignment with the AML and Counter-Terrorist Financing (**CTF**) requirements of Comoros and other applicable international standards, such as those issued by the Financial Action Task Force (**FATF**).

**Policy Scope**

This AML Policy applies to all directors, officers, employees, agents, affiliates, and any third-party service providers associated with Globus Trading Inc. It covers all interactions with clients, transactions, and business dealings across every operational location. Compliance with this policy is mandatory to maintain the integrity and lawful operation of the company.

**AML Compliance Officer**

The Compliance Officer is central to the effectiveness of this AML Policy and is responsible for developing, implementing, and monitoring the company’s anti-money laundering program.

Appointment and Qualifications: The Compliance Officer is appointed by the senior management and must possess relevant experience and qualifications in AML/CTF regulations.

Responsibilities: The Compliance Officer’s duties include:

* Developing and updating the company’s AML policies and procedures.
* Managing the company’s compliance program and overseeing adherence to AML regulations.
* Conducting and overseeing regular risk assessments to evaluate potential exposure to money laundering and terrorist financing.
* Reporting suspicious transactions to the appropriate authorities in Comoros.
* Conducting internal audits and policy reviews.
* Providing regular AML training to all employees.

The Compliance Officer has full access to all necessary information and records required to discharge these responsibilities.

**Risk-Based Approach**

Globus Trading Inc. implements a risk-based approach (RBA) to manage and mitigate risks associated with money laundering and terrorist financing. This approach involves identifying, assessing, and understanding the company’s exposure to risks and then applying commensurate measures to address them.

**Risk Assessment Categories**

Risk assessments are conducted periodically and include evaluation of:

* Customer Risk\*\*: Client type, nature of business, and geographic location.
* Product and Service Risk\*\*: Risks associated with specific services offered, including currency exchange and high-volume trading.
* Channel Risk\*\*: Risks posed by how services are delivered, including online and non-face-to-face transactions.
* Geographic Risk\*\*: The risks associated with customers and transactions from high-risk jurisdictions.

**Ongoing Risk Evaluation**

Globus Trading Inc. will continuously monitor and reassess risks to ensure that controls and procedures are effectively tailored to mitigate new and emerging threats.

**Customer Due Diligence (CDD)**

Customer Due Diligence (CDD) is essential for managing risk, particularly when establishing new business relationships or conducting significant transactions.

**CDD Procedures**

The following steps will be undertaken to verify a customer’s identity and assess risk:

* Collect and verify identity information.
* Determine the customer’s risk profile based on activity, origin, and business purpose.
* Maintain records of all identification documents.

**Identification Requirements**

* Individual Customers\*\*: Must provide valid government-issued identification (e.g., passport, national ID) and proof of residential address.
* Corporate Customers\*\*: Must submit registration documentation, such as certificates of incorporation, details of directors, and information on beneficial owners.

**Enhanced Due Diligence (EDD)**

For high-risk customers, such as Politically Exposed Persons (PEPs) or clients from high-risk jurisdictions, additional information will be collected. Enhanced Due Diligence includes:

* Obtaining source of funds and source of wealth information.
* Enhanced transaction monitoring.
* Senior management approval prior to onboarding.

**Ongoing Due Diligence**

Globus Trading Inc. will perform regular due diligence for all active customers to identify and mitigate risks arising from changes in their profile or behavior.

**Politically Exposed Persons (PEPs)**

A PEP is an individual who holds a prominent public position or has close associations with high-ranking government officials. Given their access to resources, PEPs are subject to enhanced due diligence.

**Identification of PEPs**

Globus Trading Inc. will utilize third-party screening tools to identify PEPs and their close associates. If a customer is identified as a PEP, EDD measures will be applied, including approval by senior management.

**Sanctions Screening**

Globus Trading Inc. complies with international sanctions by screening clients and transactions against relevant lists, including those from the United Nations, OFAC, and EU sanctions lists.

**Screening Process**

All clients are screened:

* During onboarding.
* At regular intervals for existing customers.
* Before processing any significant or high-risk transaction.

**Handling Positive Matches**

If a positive match is found, the Compliance Officer will suspend the transaction and review the case to determine if further action, including reporting to regulatory authorities, is required.

**Transaction Monitoring and Reporting**

To detect and prevent suspicious activity, Globus Trading Inc. employs automated and manual systems to monitor client transactions. These systems flag transactions that deviate from established patterns or exhibit high-risk indicators.

**Suspicious Transaction Indicators**

Suspicious activities include:

* High-frequency, high-value trades that are inconsistent with the client’s profile.
* Transactions involving high-risk countries or high-risk sectors.
* Any transaction that appears unusual, without a clear business purpose.

**Reporting Procedures**

All suspicious transactions are reported to the Compliance Officer, who will assess the need to file a Suspicious Transaction Report (STR) with regulatory authorities in Comoros.

**Record-Keeping and Documentation**

Globus Trading Inc. maintains accurate and comprehensive records for all clients, transactions, and due diligence measures.

**Record Types**

Records include:

* Identification documents.
* Transaction history.
* STRs and any related correspondence.
* Training records.

**Retention Period**

Records will be retained for a minimum of five years following the conclusion of the business relationship or transaction.

**Employee Training**

Employees are trained to recognize and report potential AML/CTF risks. Training is mandatory and includes:

* AML policy understanding and application.
* Identification of suspicious transactions.
* Procedures for CDD, EDD, and sanctions screening.

Annual refresher courses are provided, and new hires undergo training during onboarding.

**Whistleblower Protection**

Globus Trading Inc. encourages reporting of potential AML/CTF violations through a protected whistleblower policy.

**Confidential Reporting**

Employees and third parties can report AML/CTF concerns confidentially and without fear of retaliation. Reports may be submitted to the Compliance Officer or through a secure, anonymous reporting system.

**Investigation and Follow-Up**

All whistleblower reports are thoroughly investigated, and corrective action is taken as necessary.

**International Compliance**

Globus Trading Inc. is committed to complying with international AML/CTF standards, including those established by the FATF. The company applies global best practices to ensure cross-border compliance, particularly when dealing with foreign clients or jurisdictions.

**Foreign Jurisdiction Considerations**

When operating or serving clients in foreign jurisdictions, the company will adhere to the highest applicable standards of AML compliance and apply necessary enhanced due diligence.

**Internal Audits and Policy Review**

Audit Schedule: an independent audit of the AML Policy is conducted annually to assess effectiveness and compliance.

**Policy Amendments**

This policy is reviewed and updated as required to adapt to regulatory changes or audit findings, with final approval from senior management.

**Penalties and Consequences for Non-Compliance**

Failure to comply with the AML Policy may result in disciplinary actions, including termination of employment, financial penalties, or prosecution, depending on the severity of the violation.

**Approval and Acknowledgment**

All employees must read, understand, and formally acknowledge this AML Policy.