

# **GROWUP CAPITALS**

## **Anti-Money Laundering Policy**



# ANTI-MONEY LAUNDERING (AML)

## 1. INTRODUCTION

**1.1.** The Company strictly complies with the AML policy to identify and prevent any illegal activity including security frauds, financing of terrorism and proliferation, tax evasion, and other activities that involve laundering. In relation to the KYC Procedure, the Client must submit the required information and documents to verify his/her identification and to manage and monitor his/her activities with the Company.

## 2. COMPLIANCE

**2.1.** The Client ensures that the funds he/she uses to invest with the Company are legally obtained. If the Client is presumed or proven to be involved in any type of anti-money laundering activity, the Company reserves the right to restrict or terminate the access or use of the services and website. Any activity of the Client that is proven to be in relation with money laundering may lead to legal actions.

**2.2.** All financial transactions conducted in the official or through the respective banks and payment service providers ("PSPs") are comprehensively recorded by the Company. Such financial transaction records may be disclosed to authorized third parties for lawful reasons or if it deems obligatory.

**2.3.** In cooperation with the respective banks and PSPs, the Company strictly complies with the imposed transaction limits and availability. The Client is responsible for observing his/her transaction limits to avoid suspicious financial activities.

**2.4.** Any initiated financial transaction of a third party on behalf of the Client requires Power of Attorney ("POA") upon request subject for approval. The Company may reject or cancel any transaction without prior notice if it deems necessary. If any transaction from the third party is not approved by the Company, such transaction may be considered invalid.