






# **Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Policy**

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## 1. Our Commitment

Arbitrage Prime Limited is fully committed to combating money laundering and terrorist financing. Our AML policy ensures compliance with all relevant international standards and regulations to protect our operations from being used for illicit activities. We actively contribute to maintaining the integrity of the global financial system.

This policy outlines measures to detect, prevent, and report any activity related to money laundering, terrorism financing, or other unlawful conduct.

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## 2. What Is Money Laundering?

Money laundering is the process of disguising the origin of funds obtained through illegal means to make them appear legitimate. It typically involves three stages:

- a) **Placement:** Introducing illicit funds into the financial system, often by breaking them into smaller deposits to avoid detection (a process called "smurfing").
- b) **Layering:** Moving funds through various accounts or financial instruments to obscure their origin.
- c) **Integration:** Reintroducing the laundered money into the economy as legitimate funds.

By implementing strict controls and monitoring systems, Arbitrage Prime Limited actively works to disrupt these processes.

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## 3. Core Principles of AML at Arbitrage Prime Limited

### a) Customer Identification and Verification (KYC):

Before opening an account, all customers must provide valid identification and proof of address. This includes:

- i) **Individual Clients:** Passport, national ID card, or driver's license, along with utility bills or bank statements no older than 3 months.
- ii) **Corporate Clients:** Certificate of incorporation, articles of association, proof of registered address, board resolutions, and identification documents for directors and beneficial owners.

**b) Monitoring Client Activity:**

Continuous monitoring ensures that transactions align with the customer's profile and declared purpose of the account. Any unusual or inconsistent activity is flagged for investigation.

**c) Record Keeping:**

All transaction records, KYC documents, and reports related to suspicious activity are retained for a minimum of **7 years** after an account is closed.

**d) Deposit and Withdrawal Controls:**

- i) Arbitrage Prime Limited only accepts funds from accounts under the same name as the trading account.
- ii) Withdrawals must also go to accounts in the customer's name.
- iii) We strictly prohibit third-party transfers.

**e) Sanctions and Politically Exposed Persons (PEPs):**

Enhanced scrutiny is applied to customers flagged as PEPs or those from jurisdictions identified as high risk. All accounts are screened against international sanction lists.

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**4. Procedures and Policies****a) Know Your Customer (KYC)**

KYC is the cornerstone of our AML policy. Every client is required to:

- i) Provide valid personal or corporate identification documents.
- ii) Update their information periodically to ensure continued compliance.
- iii) Undergo additional checks if flagged as a high-risk entity or individual.

**b) Transaction Monitoring**

Suspicious transactions are flagged and reviewed using automated systems and manual oversight. Examples include:

- i) Large, uncharacteristic deposits or withdrawals.
- ii) Multiple small deposits from various sources.
- iii) Transactions to or from high-risk countries.

If a transaction raises concerns, it is escalated to the Compliance Team for further investigation.

### **c) Employee Training**

All staff undergo regular AML training to recognize and report suspicious activities. This includes understanding the latest regulatory updates and identifying high-risk behavior.

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## **5. Zero Tolerance for Non-Compliance**

Any attempt to use Arbitrage Prime's platform for money laundering, terrorist financing, or other criminal activities will result in immediate action, including:

- Freezing or closing accounts.
  - Reporting the activity to relevant authorities.
  - Possible legal action, as required by law.
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## **6. Reporting Suspicious Activity**

Clients, employees, or third parties who notice unusual activities are encouraged to report them via secure channels. Confidentiality is guaranteed for all reports.

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## **7. Governance and Oversight**

Our Compliance Officer oversees the implementation of the AML program, ensuring all activities align with international regulations. Periodic audits and independent reviews are conducted to ensure the effectiveness of this policy.

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## **Conclusion**

Arbitrage Prime Limited is dedicated to maintaining the highest standards of transparency, compliance, and integrity. By following this AML policy, we protect our customers and safeguard the financial ecosystem.

For any questions about this policy, contact us at [legal@arbitrageprime.com](mailto:legal@arbitrageprime.com).