



IF

AML Policy

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Please note that, IF is **not** an FCA Regulated firm in the UK as it does not fall under the definitions of carrying out regulated activities as defined in the Financial Services Markets Act 2000 and the Regulated Activities Order 2001 (RAO).

However, we, at IF, are committed to helping the government fight the funding of terrorism and money laundering activities and thus we try to incorporate the standards of the Anti-Money Laundering (AML) compliance and Counter-Terrorism Financing (CTF). As such, we verify, and record information that identifies each person opening an IF account, One-phase and Two-Phase account with us.

Money laundering – the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments that look legitimate to hide or distort the real source of funds.

The process of money laundering can be divided into three sequential stages:

- **Placement** - At this stage, funds are converted into financial instruments, such as checks, bank accounts, and money transfers, or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make several deposits instead of depositing the whole sum at once, this form of placement is called smurfing.
- **Layering** - Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace the money being laundered.
- **Integration** - Funds get back into circulation as legitimate to purchase goods and services.

IF adheres to the principles of Anti-Money Laundering and actively prevents any actions that aim or facilitate the process of legalizing of illegally gained funds. AML policy means preventing the use of the company's services by criminals, with the aim of money laundering, terrorist financing or other criminal activity.

To prevent money laundering, IF neither accepts nor pays cash under any circumstances. The company reserves the right to suspend any client's operation, which can be regarded as illegal or, may be related to money laundering in the opinion of the staff.

COMPANY PROCEDURES

IF will make sure that it is dealing with a real person or legal entity. IF also performs all the required measures in accordance with applicable law and regulations, issued by monetary authorities. The AML policy is being fulfilled within IF by means of the following:

- know your customer policy and due diligence
- monitoring of client activity
- record keeping

KNOW YOUR CUSTOMER AND DUE DILIGENCE

Because of the company's commitment to the AML and KYC policies, each client that reaches the 'payout' stage, must complete a KYC verification by IF. We will also apply heightened scrutiny to clients, who are residents of other countries, identified by credible sources as countries, having inadequate AML standards or that may represent a high risk for crime and corruption and to beneficial owners who resides in and whose funds are sourced from named countries.

IF reserves the right to refuse processing a transaction/payment at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international laws, IF is not obligated to inform the client if suspicious activity is reported to any corresponding regulatory or legal bodies.

Sanctioned Countries

While we welcome clients from all over the globe, governmental restrictions along with our company policies prohibit IF from opening accounts originated from the following restricted and/or sanctioned countries:

Afghanistan, Burundi, Central African Republic, Congo Republic, Cuba, Crimea, Democratic Republic of Congo, Eritrea, Guinea, Guinea-Bissau, Iran, Iraq, Liberia, Libya, Myanmar, North Korea, Papua New Guinea, North Korea, Russia, Somalia, South Sudan, Sudan, Syria, Vanuatu, Venezuela, Yemen and Zimbabwe.