



**MONEY**

**LAUNDERING**

**PREVENTION**

**POLICY**



**A.N. ALL New Investments Ltd** (hereinafter called “**The Company**”) operating under the trading name **Legacyfx.eu** is a Cypriot Investment Firm ("CIF") registered with the Registrar of Companies in Nicosia under number: HE 348194 and governed by all applicable EU and Local Legislations including European Markets in Financial Instruments Directive II («MiFID II») and the Cyprus Investment Services and Activities and Regulated Markets of 2017 («Law 87(I)/2017») as amended. The Company is regulated and supervised by the Cyprus Securities & Exchange Commission («CySEC» or the «Commission» or the «Regulator») under license number 344/17, in accordance with the provisions of the Law, Directives and Circulars issued by the Commission and legislation governing the roles and responsibilities of the Regulator.

The Company has established and implemented appropriate policies and procedures, in order to achieve timely and continued compliance with the current Anti-Money Laundering ('AML') and Combating and Financing of Terrorism('CFT') Law.

The purpose of this document is to lay down the Company`s internal policies and procedures relevant to the prevention of Money Laundering and Terrorist Financing. These policies and procedures help the Company to comply with its obligations under the various laws and regulations. Moreover, the procedures are designed to:

- identify and/or assess the potential Money laundering and Terrorist financing (ML/TF) risks to which it may be exposed from the provision of designated services to its clients that might involve or facilitate money laundering or the financing of terrorism and
- manage and/or mitigate those risks within the applicable legislative framework.

The Company complies with the Prevention and Suppression of Money Laundering and Terrorist Financing Law 188(I)2007, as amended from time to time, Directive DI 144-2007-08 regarding the Prevention of Money Laundering and Terrorist Financing as amended issued by CySEC («AML Directive»), Directive (EU) 2018/843 («AMLD V»)



amending Directive (EU) 2015/849 (AMLD IV) of the European Parliament and the Council on the Prevention of the use of the financial system for the purpose of money laundering and terrorist financing («EU Directive»); EBA's Joint Guidelines under Articles 17 and 18(4) of Directive (EU) 2015/849 on anti-money laundering and countering the financing of Terrorism («The ML/TF Risk Factors Guidelines»), the Financial Action Task Force (FATF) recommendations, Directives, Circulars, Reporting Forms and other documents of the Commission which address the issues related to the Anti-Money Laundering procedures and any other legislative act of the European Parliament and the Commission currently in force substituting or amending the above mentioned.

At the Company, we are committed to prevent any money laundering activities through our services thus we have developed and implemented a compliance program consisting of policies, procedures, transaction monitoring systems, internal controls, and personnel training in line with applicable laws and regulations. The AML/CFT program which implements a risk-based approach to managing the Company's AML risk includes but is not limited to:

### **1. Customer On-boarding Policy**

- Define the policy and process followed during on-boarding of new clients in order to adequately follow the applicable legal and regulatory requirements.

### **2. Risk-based Approach**

- Customer Due Diligence, which incorporates Know your Customer procedures for the Identification and verification of the identity of our Customers or Beneficial owners (where applicable)
- Identification and performance of Enhanced Due Diligence (EDD) measures for monitoring high-risk clients, including Politically Exposed Persons (PEPs), their relatives and close associates.



### 3. Customer Screening

- Adoption of policies and procedures to ensure compliance with the applicable restrictive measures (i.e. EU/UN/OFAC Sanctions) and that the Company doesn't engage in any activity for, on behalf of, or maintain a relationship with a person against whom enforcement measures are affected. In respect, ongoing customer screening is performed against a global collection of sanctions, PEPs, Adverse Media and Enforcement Data.

### 4. Ongoing Monitoring of Customers

- Establishment of systems and procedures to monitor customer's account activity and transactions.

### 5. Training

- Provision of adequate and frequent AML/CFT training for Company employees, relevant to the role they undertake, for the purpose of prevention of money laundering and terrorist financing.

### 6. Reporting

- Creation, tracking and filing of Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) to the appropriate regulatory authority when required.

### 7. Record retention

- Retention of customer documents, information, correspondence, and transaction records for a period of five (5) years after the termination of the business relationship, or after the date of an occasional transaction.



Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company, i.e. the Republic of Cyprus; (b) the country of origin of any funds transmitted to the Company; and (c) the destination country of any funds refunded by or withdrawn from the Company.

The Company reserves the right to refuse to process a transfer of funds at any stage if it believes it to be connected in any way to criminal activities or money laundering.

The Company is obliged to report all suspicious transactions and is prohibited from informing the client that they have been reported for suspicious account activity. Account misuse may result in criminal prosecution.

The Company is fully committed to remaining vigilant to prevent the use of its products and services by those who seek to abuse them. It continually seeks to combat money laundering and terrorist financing through the prevention, detection, and reporting of unusual or suspicious behavior.

The Company reserves the right to review and/or amend its Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.

Our Money Laundering Prevention Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have.

Should you have a question about our Money Laundering Prevention Policy please direct your questions to our Compliance Department: [compliance@legacyfx.eu](mailto:compliance@legacyfx.eu)