

## Anti-Money Laundering Policy

FIRSTRADERS LTD is incorporated and registered under the laws of the Kingdom of Spain. Firstraders obtained a license from the National Securities Market Commission of Spain (hereinafter referred to as the "CNMV"), with a Regulatory License No.: 2486. The Company merely acts as an introducing broker and/or facilitator for the purpose of the client entering into a financial services agreement with Firstraders.

What is money laundering?

Money laundering is the act of hiding money obtained illegally, so the source appears legitimate. We adhere to strict laws, rendering it illegal for us or any of our employees or agents to knowingly engage in or attempt to engage in any activities remotely related to money laundering. Our anti-money laundering policies increase investor protection and client security services, as well as offer safe payment processes.

Firstraders has policies in place to deter people from laundering money. These policies include:

- 1. Ensuring clients have valid proof of identification and maintaining records of identification information.
- 2. Determining that clients are not known or suspected terrorists by checking their names against lists of known or suspected terrorists.
- 3. Informing clients that the information they provide may be used to verify their identity.
- 4. Closely following clients' money transactions. Not accepting cash, money orders, third party transactions, exchange house or Western Union transfers.



Money laundering stages:

- 1. Cash or cash equivalents are placed into the financial system.
- 2. Money is transferred or moved to other accounts through a series of financial transactions designed to obscure the origin of the money.
- 3. Funds are reintroduced into the economy so that the funds appear to have come from legitimate sources.

Trading accounts can be used to launder illicit funds or to hide the true origin of the funds. In particular, a trading account can be used to execute financial transactions that help obscure the origins of the funds. We direct fund withdrawals back to the original source of remittance, as a preventative measure.