



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

Capital Nine Global Limited (hereafter referred as “Capital Nine”, “we”, “us” or “Company”) is dedicated to highest standards of actively preventing money laundering AML and CTF and any actions that aid it or support terrorist or criminal funding. The company strictly complies with AML regulations as per the law, expecting its officers, staff, and appointed producers to uphold these guidelines in stopping the misuse of its services and products for money laundering intentions

## Customer Identification Program

In adherence to applicable regulations and laws, we gather and validate client information commonly referred to as Know Your Client (KYC) information. KYC encompasses various details, including identity, contact information, National Identifier, socio-demographic data, financial information, and documentary data, among others. Capital Nine has implemented a Customer Identification Program (CIP) wherein it will require its clients (individuals & corporates) to gather and submit identification details, obtain specific minimum identification data from each customer, and document such information, as well as the methods and outcomes of verification.

Every client of the company is required to undergo a verification process either manual, automated or a combination of both. The company applies heightened scrutiny to clients, who are residents of countries having inadequate AML standards or that may represent a high risk for crime and corruption.

The client acknowledges and agrees that their consent is voluntarily provided to Capital Nine for client identification and verification procedures.

Each trading account applicant must first be approved and accepted by us before be allowed to start trading.

### 1. For Personal Accounts

- Passport Copy to prove nationality
- Residency document like Valid Visa or National ID to identify and confirm residency outside of home country
- Utility Bill, Tenancy Contract, Bank /Credit Card statement no older than 90 days to prove current residential address. Address proof should be in the name of the client. In the event the client does not have a valid address proof under his/her name, additional documentation and verification may be requested.

### 2. For Corporate Accounts

- Certificate of Incorporation/Registration;
- Articles of Association/Memorandum;
- Certificate of Directors and all Shareholders/Members/Partners including the percentage of their ownership;
- A proof of company's registered address not older than 90 days / as well as principal place of business (Utility bill);
- A resolution of the board of directors of the legal person for the opening of the account and granting authority to those who will operate it; and
- LEI number.

#### 2.1 Documents and data for the verification of the identity of:

- The persons that are authorized by the legal person to operate the account
- Registered shareholders/beneficial owner/s of the legal person
- Directors
- Passport Copy to prove nationality
- Residency document like Valid Visa or National ID to identify and confirm residency outside of home country
- Utility Bill, Tenancy Contract, Bank /Credit Card statement no older than 90 days to prove current residential address

The KYC procedure is an ongoing requirement and must be refreshed at least annually, except in cases where a client is required to update documents before the routine yearly KYC update, such as document expiry. In such instances, clients will receive a reminder 30 days in advance. Clients will have a grace period of up to 15 days post the document's expiry, following which their withdrawals may be impacted.

## Record Keeping

Records must be kept of all transaction data and data obtained for the purpose of identification, as well as of all documents related to money laundering topics (e.g. files on suspicious activity reports, documentation of AML account monitoring, etc.). Those records are kept for a minimum of 7 years after the account is closed.

## Deposits & Withdrawals

1. In accordance with AML / CTF laws, we are unable to accept or transfer funds to third-party accounts.
2. Funds transmitted to Capital Nine must originate from a bank account, Credit/Debit card, or Alternative Payment Method (such as Skrill, Neteller, Fasapay, or others) under the identical name as the trading account registered with Capital Nine Global Limited.

3. Withdrawals from a trading account must be directed to a bank account, Credit/Debit card, or Alternative Payment Method under the same name as the Capital Nine trading account. All initial withdrawal requests must be verified for safety and security by provision of a bank statement; which includes account holder information and bank details. We will not accept deposits or withdrawals made under a different name. If a trading account was credited in a way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account under the same name as the trading account name with Vantage as long as the client provides satisfactory evidence of the ownership of bank account where the funds originated from as well as the destination bank account.
4. Withdrawal requests are processed based on a First-in-First-Out (FIFO) principle, aligned with the funding source. For instance, if a deposit is made using a Credit Card and a subsequent withdrawal is requested, the withdrawn amount to the related Credit Card cannot surpass the original deposited sum. Any profits exceeding the deposited amount are transferred to a nominated bank account, which must be in sync with the name on your trading account with Capital Nine.

Examples:

4.1 Client deposits \$100 via Credit Card and earned a profit of \$1,000. Requesting a withdrawal of \$1,000, client will get \$100 to Credit Card and the rest \$900 to bank account.

4.2 Client deposited \$100 via Alternative Payment Method and \$50 via Credit Card. Requesting a Skrill withdrawal of \$120, you will get \$100 to Skrill and \$20 to the card.

5. Should a withdrawal be flagged for suspicious activity, Capital Nine places the withdrawal on hold while our staff conducts a thorough investigation before further processing.

## Freezing Of Accounts

Capital Nine reserves the right to refuse processing a transaction or continuity of trading account/activities and suspend the trading account at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, Capital Nine is not obligated to inform the client if suspicious activity is reported to any corresponding regulatory or legal bodies.

## UN Sanction List

While we welcome clients from all over the globe, all individuals and entities will be checked against applicable lists of sanctioned countries published by the United Nations and periodically rechecked against updated lists. If a customer is found to belong to a country on the sanctioned list, we will not establish a relationship with the client. For existing clients discovered to be from countries newly added to sanctioned countries list, their accounts will be terminated.