



PURE MARKET

AUTHENTIC EXPERIENCE

Anti-Money Laundering Policy

INTRODUCTION

Pure M Global LTD, operating under the business name Pure Market Broker (the “Company”), is registered at 1st Floor, B&P House, Kumul Highway, Port Vila, Republic of Vanuatu, under registration number 14801. Pure Market is licensed under the Financial Dealers Act (CAP 70) by the Vanuatu Financial Services Commission. As a license holder, our operational reporting obligations are regulated under the Financial Transactions Reporting Act 2000. Our Anti-Money Laundering and client compliance requirements adhere to the Anti-Money Laundering and Counter-Terrorism Financing Act of 2014.

The Company aims to detect, manage and mitigate the risks associated with money laundering and the financing of terrorism.

The phrase “money laundering” covers all procedures to conceal the origins of criminal proceeds so that they appear to originate from a legitimate source.

The process of money laundering generally involves three main stages: Placement, Layering, and Integration. Here’s a detailed explanation of each stage:

Placement is the first stage in the money laundering process. This is where the illicit funds are introduced into the financial system. This stage is the most vulnerable to detection because it’s the initial point of entry.

Layering is the second stage, where the goal is to obscure the origins of the money. This involves a complex series of financial transactions designed to make tracing the origin of the funds difficult.

Integration is the final stage where the now-cleaned money is reintroduced into the legitimate economy. At this point, the funds appear to be from legal sources and can be used freely.

The Company has introduced strict procedures aimed at the detection, risk prevention or mitigation in respect of any suspicious activities performed by customers. The Company is required to constantly monitor its level of exposure to the risk of money laundering and the financing of terrorism. The Company believes that if it knows its client well and understands its instructions thoroughly, it will be better placed to assess risks and spot suspicious activities.

COMPANY PROCEDURES

The Company has established a comprehensive compliance program that encompasses policies, procedures, transaction monitoring systems, internal controls, and employee training, all aligned with relevant laws, regulations, and international best practices. The AML/CFT Program, which utilizes a risk-based strategy to address the Company’s AML risk, includes the following components, among others:

- a) Customer Identification and Verification (Know Your Customer - KYC)
- b) Client Activity Monitoring
- c) Record Keeping
- d) Deposit and Withdrawal Requirements

a) Customer Identification and Verification (Know Your Customer - KYC).

Know Your Customer (KYC) procedures are critical for verifying the identity of clients to prevent fraud, money laundering, and other illicit activities. During the process of registration, each client provides personal information, specifically: full name; date of birth; country of origin; and complete residential address and client is required to upload the follow documents:

Individual Client

- Government-issued ID (passport, driver's license, national ID card)
- Proof of address i.e. utility bill (landline, water, electricity, gas, internet), bank statement, local authority tax bill, reference letter from bank or attorney.

All the above documents must not be older than 6 months.

Corporate Client

- Certificate of Incorporation.
- Memorandum and Articles or local equivalent.
- Certificate of Directors and Secretaries.
- Certificate of good standing/ Incumbency.
- Certificate of Shareholders.
- Proof of address of the Company.
- Board resolution for the opening of account.
- A government issued business license (if applicable).
- Latest audited financial statements or management accounts or Trial Balance signed by the directors.
- Proof of identity and proof of address for each shareholder that has more than 10% stake in the Company.
- Proof of identity and proof of address of the authorized person and at least 1 director of the Company.

All the above documents must not be older than 6 months and original or true copies of the original certified by a lawyer or notary.

The Company reserves the right to impose additional due diligence requirements to accept Clients residing in certain countries.

If an existing customer either refuses to provide the information described above or if a customer has intentionally provided misleading information, the Company, after considering the risks involved, will consider closing any of an existing customer's account.

When obtaining information to verify the customer's statements about sources of funds or wealth, the Company's staff will most often ask for and scrutinize details of the person's employment status or business/occupation. The Company's staff will ask for whatever additional data or proof of that employment/occupation that may be deemed necessary in the situation, particularly the appropriate confirming documents (employment agreements, bank statements, letter from employer or business etc.).

b) Client Activity Monitoring

The Company will conduct ongoing customer due diligence and account monitoring for all business relationships with customers. It particularly involves regularly reviewing and refreshing the Company's view of what its customers are doing, the level of risk they pose, and whether anything is inconsistent with information or beliefs previously held about the customer. It can also include anything that appears to be a material change in the nature or purpose of the customer's business relationship with the Company.

The system of monitoring implemented by the Company relies both on automated monitoring and, where appropriate, manual monitoring by the staff.

c) Record Keeping

The Company undertakes to keep the records of all the payment transactions, including but not limited to any suspicious transactions or money laundering enquiries, made by its customers for a period of 6 years after the completion of the transaction. The records will be kept in such a manner as to enable the transactions to be readily reconstructed at any time by the FIU authorities.

d) Deposit and Withdrawal Requirements

All deposits and withdrawals must comply with anti-money laundering (AML) and counter-terrorism financing (CTF) regulations.

Pure M Global LTD does not receive or deposit funds to third parties.

Funds sent to Pure M Global LTD must originate from a bank account, credit/debit card, or alternative payment method registered under the same name as the trading account with Pure Market Broker.

Withdrawal requests will be processed using the same method as the initial deposit, up to the amount originally deposited. Profits may be withdrawn using an alternative method upon the client's request, except under the following condition:

- If the bank account from which the initial funds were deposited is closed, the client must provide a bank account closure letter and details of a new bank account to proceed with the transfer.

The Company reserves the right to review and/or amend this policy at its sole discretion whenever it is deemed necessary.

Contact details

Should you have any questions about our Anti-money Laundering and KYC Policy please contact our Compliance Department at compliance@puremarketbroker.com



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www.puremarketbroker.com