

Anti-Money Laundering

Money laundering occurs when funds from an illegal/criminal activity are moved through the financial system in such a way as to make it appear that the funds have come from legitimate sources.

Money Laundering usually follows three stages:

- Firstly, cash or cash equivalents are placed into the financial system.
- Secondly, money is transferred or moved to other accounts (e.g. futures accounts)
 through a series of financial transactions designed to obscure the origin of the
 money (e.g. executing trades with little or no financial risk or transferring account
 balances to other accounts)
- Finally, the funds are reintroduced into the economy so that the funds appear to have come from legitimate sources (e.g. closing a futures account and transferring the funds to a bank account).

Trading accounts are one vehicle that can be used to launder illicit funds or to hide the true owner of the funds. In particular, a trading account can be used to execute financial transactions that help obscure the origins of the funds.

Xtrade will fight against money launderers as it does not support nor accept money laundering.

Accordingly the Company has policies in place to identify and prevent people from laundering money such as:

- Ensuring and maintaining clients' valid proof of identification. Checking clients' names against lists of known or suspected terrorists.
- Informing its clients that the information they provide may be used to verify their identity.
- Closely monitoring clients' money transactions.
- Additionally Xtrade executes funds withdrawals back to the original source of remittance, as a preventative measure.

The Company has implemented a compliance program to deter, detect and report potential suspicious activity in order to protect both Xtrade and its clients. For questions/comments regarding these guidelines, contact Compliance at compliance@xtrade.com.