Anti-Money Laundering & KYC Requirements Website Note

Pepperstone EU Limited

Reg Nr.: HE 398429 CySEC License: 388/20 Version: 3.0 Review: Annual

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ML and **TF** prevention

Pepperstone EU Limited is committed to preventing and detecting Money Laundering and Terrorist Financing, as per all current Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) obligations required in the Cyprus AML Law 188(I)/2007 as amended, the 4th AML Directive (EU) 2015/849, the 5th AML Directive (EU) 2018/843 amending the 4th AML Directive, Directive (EU) 2018/1673 on combating ML by criminal law (often referred to as the 6th AML Directive), Directive (EU) 2024/1640 amending Directive(EU) 2019/1937, and amending and repealing Directive (EU) 2015/849, as well as any regulatory guidance issued by the Cyprus Securities and Exchange Commission "CySEC" in the form of Directives and Circulars.

Pepperstone fully acknowledges that its products and services may potentially be at risk from individuals or groups seeking to launder criminal proceeds or facilitate funds designated for the financing of terrorism. As such, Pepperstone is committed to fostering and promoting a compliance culture throughout the firm which underpins the importance of preventing Money Laundering and Terrorist Financing.

We are committed to prevent any money laundering activities through our services and as such, we comply with regulatory requirements such as:

- 1. Identifying our clients (KYC/Due Diligence Procedures).
- 2. Identifying, monitoring, and reporting any kind of suspicious transactions both internally and to regulatory authorities if deemed necessary .
- 3. Maintaining transaction records and client data for as long as we are obliged under our regulatory obligations.

Clients' KYC and Due Diligence Procedure

We are a regulated Cyprus Investment Firm (CIF) and as such, we are required by our regulatory obligations to collect and validate proof of identification from our customers prior to account opening and customers' deposits, or withdrawals. We need to know our customers and who's using our services.

Pepperstone reserves the right to refuse to open an account or process a transfer of funds at any stage for a client, if it suspects it is connected in any way to money laundering, terrorist financing or any other criminal activity.

We need to verify our customers' identity and comprise the risk profile of our customers. Pepperstone will conduct distinct levels of due diligence depending on the outcome of each customer's risk assessment (i.e. low, medium, or high risk).

To complete our due diligence the customer's ID must be sought. This could include Pepperstone requesting a physical copy of the customer's government issued ID (or equivalent) and/or by performing electronic Know Your Customer ("KYC") checks. Further, depending on the customer's risk profile we need to obtain at least a Proof of Address (POA) document.

Pepperstone has implemented a risk based approach to mitigate ML/TF risks.

Depending on various risk factors, additional due diligence measures may be applied. These shall involve requesting supplementary identification documents and/or proof of address for verification, along with further inquiries into the client's source of wealth or funds.

Note: Individuals or legal entities sanctioned by the EU or the UN are not accepted as clients.

Types of documents we accept:

- A. A valid Government issued ID document (that should include full name, date of birth and photo ID) can be one of the below:
- Passport
- National Identity Card
- Driver's license
- Permanent Resident Card

Note that in certain cases depending on our regulatory obligations, a passport may be mandatory.

B. A valid Proof of Address (POA) to confirm the customer's residency

The POA:

- Must be an Utility bill (e.g. phone landline, TV bill, electricity, water, gas, current bank reference letter/statement, resident certificate, stamped and signed tenancy contract)
- Must be less than six months old
- Must show name and residential address (PO Boxes will not be accepted)
- Name and residential address on the document must match the application form

Should you have a question on our AML and KYC/DD procedures please direct your enquiry at support@pepperstone.com.

