AML, CTF & SANCTIONS POLICY

1. Statement of Commitment & Organizational Responsibility

- A. Financial Crime Compliance: Golden Trader Ltd (the "Company"), incorporated in Saint Lucia, maintains strict compliance standards to prevent money laundering, terrorist financing, and financial crime.
- B. Legal Transparency: The Company adheres to global regulatory standards, with the Management Board ensuring active controls against illegal proceeds, sanctions violations, and financial crime.
- C. Cultural Integration: AML/CTF and Sanctions compliance is integrated into the company culture, covering all MT5 trading, wallet, and payment channels.

2. Core Customer Due Diligence (CDD) & KYC Framework

To prevent illicit activity, the Company enforces an automated, mandatory KYC/CDD program:

- A. KYC Practices: We collect and verify comprehensive data on identity, residence, financial activity, and source of funds to understand customer profiles.
- B. Identity Verification: Validated using high-resolution government ID and Proof of Address (issued within 6 months) via independent, trusted sources.
- C. Corporate Ownership Structure (KYB): For legal entities, we conduct KYC/KYB checks to identify beneficial owners with over 10% ownership.

3. Real-Time Sanctions & PEP Screening

The Company utilizes automated software to screen all clients and transactions in real-time:

- A. Sanctions Regimes: Daily screening of client databases and inbound transactions against US OFAC, UK, UN, and EU Sanctions lists.
- B. Politically Exposed Persons (PEPs): Mandatory, ongoing screening of PEPs, including close associates, with approval required from authorized management for any high-risk relationships.

4. Suspicious Activity Tracking & Escalation Protocols

- A. Transaction Monitoring: The Company monitors transaction velocity, volumes, and geographic irregularities.
- B. Suspicious Activity Reporting (SAR): Staff are trained to identify and escalate red flags. High-risk profiles are locked and reported per Saint Lucia regulations.
- C. Prohibition of Third-Party and Cash Funding: To ensure traceability, cash, third-party credit cards, and third-party crypto wallet transfers are prohibited. Funding must match the registered account holder 1:1.
