

# AML Policy

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## **Atlas Capital Financial Services Ltd. Anti-money laundering policy statement**

It is the policy of Atlas Capital Financial Services to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorists or criminal activity.

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origin of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets. Generally, money laundering occurs in three stages:

Atlas Capital Financial Services shall apply appropriate anti-money laundering measures and procedures so as to focus its effort in those areas where the risk of money laundering and terrorist financing appears to be comparatively higher.

The adopted risk-based approach that is followed by Atlas Capital Financial Services recognises that the money laundering or terrorist financing threat varies across clients, countries, services and financial instruments allows the Company to differentiate between clients of the Company in a way that matches the risk of their particular business.

The risk-based approach adopted by Atlas Capital Financial Services involves specific measures and procedures in assessing the most cost effective and appropriate way to identify and manage the money laundering and terrorist financing risks faced by the Company. Such measures include identifying and assessing the money laundering and terrorist financing risks emanating from particular clients, financial instruments, services, and geographical areas of operation of its clients, managing and mitigating the assessed risks by the application of appropriate and effective measures, procedures and controls and continuous monitoring and improvements in the effective operation of the policies, procedures and controls.

The application of appropriate measures and the nature and extent of the procedures on a risk-based approach depends on different indicators. Such indicators include the following: the scale and complexity of the services offered, geographical spread of the services and clients, the nature (e.g. non face-to-face) and economic profile of clients as well as of financial instruments and services offered, the distribution channels and practices of providing services etc.

## **Client acceptance policy**

The Client Acceptance Policy defines the criteria for accepting new clients and defines the client categorisation criteria which shall be followed by the company and especially by the employees which shall be involved in the client account opening process. Atlas Capital Financial Services shall classify clients into various risk categories and based on the risk perception decide on the acceptance criteria for each category of client.

## **Client due diligence and identification procedures**

Atlas Capital Financial Services shall duly apply client identification procedures and client due diligence measures.

## **On-going monitoring process**

The constant monitoring of the clients' accounts and transactions is an imperative element in the effective controlling of the risk of money laundering and terrorist financing.

## **Recognition and reporting of suspicious transactions / activities**

In cases where there is an attempt of executing transactions which knows or suspects that are related to money laundering or terrorist financing, Atlas Capital Financial Services will proceed in accordance with the Law.