



ANTI MONEY LAUNDERING (AML) POLICY

Dated: 28 December 2018

1. GENERAL DEFINITION

1.1 Money laundering is the act of converting money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human traffic etc.) into money or investments that appear to be legitimate. Such activity is used so that the illegal source of money and other material values cannot be traced.

2. POLICY STATEMENT AND PRINCIPLES

2.1 ZT Markets Limited (hereinafter called the "Company") is an entity incorporated under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent of the Grenadines, 2009, with the following registrations: Company Number 25071IBC2018.

2.2 The Company is committed to the highest standards of Anti Money Laundering (AML) and Counter Terrorism Financing (CTF) compliance. To help the government fight the funding of terrorism and money laundering activities, law requires all financial institutions to obtain, verify, and record information that identifies each person opening an account.

2.3 All business units and locations within The Company will cooperate to create a cohesive effort in the fight against money laundering. Each business unit and location has implemented risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the international AML and CTF laws.

2.4 All efforts exerted will be documented and retained in accordance with the respective laws. The AML and CTF compliance committee is responsible for initiating Suspicious Activity Reports (SARs) and other required reporting to the appropriate law enforcement or regulatory agencies.

2.5 Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the AML and CTF compliance committee.

3. POLICY

3.1 It is the policy of The Company to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

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3.2 The Company is committed to AML and CTF compliance in accordance with applicable law and requires its officers, employees and appointed producers to adhere to these standards in preventing the use of its products and services for money laundering purposes.

4. CUSTOMER INFORMATION VERIFICATION

4.1 Because of the Company's commitment to the AML, CTF and KYC policies, each client of the company must complete a verification procedure.

4.2 Before the company commences any business with the client, the company ensures that satisfactory evidence is produced or such other measures that will produce satisfactory evidence of the identity of any customer or counterparty are taken.

4.3 The company also applies heightened scrutiny to clients, who are residents of other countries, identified by credible sources as countries, having inadequate AML standards or that may represent a high risk for crime and corruption and to beneficial owners who resides in and whose funds are sourced from named countries.

4.4 For verification purposes, The Company shall rely on a government-issued identification to establish a customer's identity. The Company will analyse the information provided to determine if there are any logical inconsistencies in the information obtained.

4.5 The Company will document its verification, including all identifying information provided by the customer, the methods used and the results of the verification.

4.6 If a customer either refuses to provide the information described above when requested or appears to have intentionally provided misleading information, the appointed agent shall notify the chief compliance manager. The Company will thereafter decline the application.

5. PREVENTION OF THIRD-PARTY FUNDING, TRANSFER & WITHDRAWAL

5.1 The Company strictly does not allow third-party funding. Any funds incoming to a client's account must come from the same account holder.

5.2 The Company strictly does not allow transfer of trading funds between different trading accounts belonging to different account holders. This is to prevent the possibility of money laundering.

5.3 The Company strictly implements the policy in which withdrawals must be performed only to an account in the account holder's own name.

5.4 All client withdrawal requests shall be processed in the currency in which the deposit was originally made.

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6. MONITORING AND REPORTING SUSPICIOUS ACTIVITY

6.1 The Company collects and verifies identification data of the Client and logs and maintains itemized statements of all transactions carried out by the Client.

6.2 If the Company systems track suspicious transactions or transactions executed under non-standard conditions, it reserves the right to request additional information from the Client regarding these transactions.

6.3 The Company performs its anti-money laundering compliance on the basis of AML/FATF recommendations.

6.4 The Company neither accepts cash deposits nor disburses cash under any circumstances.

6.5 The Company reserves the right to refuse to process a transaction at any stage when it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with International Law, The Company is not obligated to inform the client that they were reported to the corresponding governing bodies due to client's suspicious activity.

7. RESTRICTED COUNTRIES

7.1 The Company does not service US residents or entities of any kind.

7.2 While we welcome clients from all over the globe, governmental restrictions along with our company policies prohibit The Company from opening accounts originated from the following Restricted, FATF and/or OFAC sanctioned countries, as well as high risk and non-cooperative jurisdictions: Afghanistan, Bosnia and Herzegovina, Burundi, Central African Republic, Democratic People's Republic of Korea (DPRK), Democratic Republic of Congo, Iraq, Iran, Lebanon, Libya, Moldova, Montenegro, Serbia, Somalia, Sudan, South Sudan, Syria, Venezuela, Yemen, Yugoslavia, Zimbabwe

7.3 The above list of restricted countries is not exhaustive and may change from time-to-time.

8. RELEVANT DEPARTMENT

Customer Service Department
Email: support@zentrader.com

Compliance Department
Email: compliance@zentrader.com

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