ModMount

Anti-Money Laundering Policy

July 2024

MODMOUNT SERVICES LIMITED (hereinafter referred to as the **"Company"** or "Modmount") is registered in Seychelles under the Companies Act 1972, with registration number as 8426105-1 and licensed as Securities Dealer with the Seychelles FSA with License Number as SD119. The Company's registered address is located at, Unit No: S41C, Espace Building, Ile Du Port ,Mahe, Seychelles.

1. Modmount AML Policy

At Modmount we are devoted in preventing money laundering activities and identifying suspicious transactions, therefore, we have implemented the following measures in order to comply with our regulatory requirements:

- Verifying our client's identity and place of residence.
- Identifying, monitoring and reporting any kind of suspicious transactions.
- Keeping documents and records for at least 5 years after the termination of the business relationships with our clients.
- Continuous training of our staff to recognize suspicious transactions, fulfill all reporting obligations and keep up to date with the AML regulatory requirement.
- Depending on client's location, report any suspicious activities to authorities in several countries.

In addition to the abovementioned, Modmount:

- Collects, verifies and updates at least annually the personal identification information of all account holders.
- Tracks any suspicious transactions made by clients and any transactions executed under nonstandard trading conditions.
- Does not accept cash deposits or disbursements under any circumstances.
- Matches each deposit to the account name held on file for that customer.
- Monitors funding from bank accounts held outside the account holder's home country.
- Reserves the right to refuse to process a transaction, where it believes that the transaction is connected in any way to money laundering or criminal activity. In accordance with the international law, Modmount is under no obligation to inform the client when a suspicious activity is reported to any corresponding regulatory or legal bodies.
- All Company's client funds are held in separate, segregated accounts, that are designated solely for client deposits and withdrawals.

2. Account opening procedures - Know Your Customer Policy ("KYC")

Account Opening Requirements

In order to open a trading account with Modmount, the potential client must have a permanent residence in a country which is not restricted for registration in accordance with Internal Policies of the Company and be over 18 years old. In addition, the steps listed below must be followed:

- **complete the account opening application**, which includes providing personal information (name, date of birth, etc.), information relating to his/her economic profile (annual income, estimated net worth, employment status, etc.), information relating to the intended activities with the Company (purpose of transactions, expected deposits, etc.), and other necessary information.

- **provide identification documents** which consist of a valid form of government-issued identification and a proof of residence.

! Please note that from the day of receipt of the account opening application a timeframe of 2 weeks is given to provide the required information and documentation. If the potential client fails to provide these within the aforementioned timeframe, the Company will decline the application and in case of any deposits, will refund the available balance back to the method used to deposit the funds.

3. Identification/Self Certification Documents:

3.1. Proof of Identity

Following documents are accepted as a Proof of Identity:

- A valid Passport
- A valid National Identity Card
- A valid government ID, such as a Driver's License
- A valid Residence Permit

The document must be issued on your name and all information on the document including your photo must be visible.

Please keep in mind that your Proof of Identity must be updated once the document expires.

All photo IDs are verified through a third-party compliance software. The Company reserves the right to ask for certified true copies of the abovementioned documents.

3.2. Proof of Residence

Following documents are accepted as a Proof of Residence:

- A utility or phone bill (land line telephone or Internet bill).
- A bank statements.
- Governmental documents, such as tax bill or residence certificate (stamped).

Please note that your proof of residence document must:

- be recent (not older than 6 months),
- clearly show your name,
- clearly show permanent address
- clearly show date of issue.

Please keep in mind that your Proof of Residence must be updated at least once every 6 months.

The Company reserves the right to ask for certified true copies of the abovementioned documents.

Additionally, the company reserves the right to request additional documents from its clients whenever it deems necessary.

4. Prohibited/restricted jurisdictions

MODMOUNT does not provide its services to residents of the European Union or to any other jurisdiction where such distribution would be contrary to local laws and regulations.

5. Verification of Account

MODMOUNT holds the sole responsibility of the verification of new accounts. Once all the required KYC documentation is submitted, the Company will review the submitted documentation and inform the potential Client accordingly. In case where the potential client fails to submit or respond to comments made by the Company in regards KYC documents, the Company retains the right to decline the application and in case of any deposits, may decide to refund the available balance back to the method used to deposit the funds.

6. Bank Account Requirements

Modmount account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

7. Deposit via Third Party

Modmount may accept third party deposits on behalf of the Account Holder provided that specific conditions are met.

Third parties must provide:

- The 3rd Party must provide Proof of identity and Proof of Residence
- Consent letter for related parties
- Proof of relation

8. Funds Withdrawal Procedure.

The withdrawal procedure at Modmount detailed below follows strict principles to ensure that the funds are send back to their originating source.

a. Modmount customers must submit a Withdrawal request in order to initiate the withdrawal process.
b. The withdrawal will then be handled by the Backoffice and Support Department.
c. If there is no mismatch or suspicious activity the Backoffice and Support Department will approve the withdrawal, and the funds are released to the client.
d. In the event that the Backoffice and Support Department believes there was suspicious activity on the account, the Modmount Anti-Money Laundering Compliance Officer (hereinafter the “AMLCO”) will be informed, in order to perform further investigation.

e. If the withdrawal will be flagged for suspicious activity by the AMLCO, the withdrawal is placed on hold, and send to Company's Management.
f. Modmount's Management along with the AMLCO will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

9. Compliance Footnote.

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the Company's Compliance Team. A detailed copy of our Compliance Policy is available for qualified institutions, regulatory bodies and related counterparties.

No substitutions or modifications will be accepted to the requirements above. The Compliance Department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in:

- the country of incorporation of the Company, i.e. Seychelles;
- the country of origin of any funds transmitted to Modmount; and
- the destination country of any funds refunded by or withdrawn from the Company.

Modmount does not wish to enter into a business relationship if the funds are sourced from criminal activities, or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Anti Money Laundering Policy, at its sole discretion, whenever it deems fit or appropriate.

For additional questions concerning Company's policies, please contact our Support Department who will assist or allocate your request to the relevant Department:

Email: support@modmountltd.com

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Modmount Services Limited is authorised and regulated by the Financial Services Authority (FSA) of Seychelles with licence number: SD119. Modmount Services Limited's registration number is 8426105-1.

Registered Address: S41C, Espace Building., Ile Du Port ,Mahe, Seychelles

Website: modmountltd.com
Email: support@modmountltd.com