



**NADEX
ECOSYSTEM**

ANTI-MONEY LAUNDERING



Company name: **NADEX ECOSYSTEM LTD**

Company number: **15483068**

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Anti-money laundering policy and "Know Your Customer" principle

To ensure the protection of its clients' financial resources, Nadex Ecosystem, hereinafter referred to as "the Nadex" strictly adheres to national and international laws as well as global standards on anti-money laundering.

In order to assess the risks of money laundering and terrorist financing through its system and to prevent such activities, the Nadex has developed a set of coordination measures. These rules apply to Nadex Ecosystem, which operates through the web resource <https://nadex.group> (hereinafter the "Site") as well as to its partners and clients who register on the Site and open an account.

When opening an account on the Site, the client undertakes to provide up-to-date information and documents for verification that meet the requirements of the current legislation. He also agrees with the terms of this Policy and undertakes to comply with them. The Client guarantees the legal origin, possession and right to use the funds transferred to the Fund account.

1. General Provisions

1.1. This Policy is aimed at combating criminal actions aimed at disguising the true origin of illegally obtained funds for the purpose of money laundering.

1.2. The Fund requires its employees, clients and subsidiaries to follow the principles of this Policy and not to allow the use of provided services for money laundering purposes.

1.3. The legislation qualifies money laundering as a criminal act, including fraud, organized crime, corruption, terrorism and other similar crimes.

1.4. The process of money laundering includes three stages: "placement" - the introduction of illegally obtained funds into the financial system for legalization, "layering" - multiple transactions of funds to conceal their origin, and "integration" - the return of money into the economy under the guise of legal income.

2. Obligations of the Fund's clients

2.1. Observe the legislation aimed at combating illegal financial transactions, fraud and money laundering.

2.2. Not to participate in illegal financial activities and other illegal operations using the Website.

2.3. Provide up-to-date personal data at the request of employees for verification.

3. Obligations of the fund

3.1. Conduct internal investigations when suspicious transactions are detected, including money transfers from clients from unreliable sources.

3.2. Provide customer information based on official requests from law enforcement agencies and regulators.

3.3. Use automated systems to record information about clients, their accounts and conducted transactions.

3.4. The Company has the right to exchange information on suspected illegal activities with financial institutions and law enforcement agencies in order to prevent money laundering and other crimes, as well as to ensure the provisions of this Policy

4. Activities of the fund

4.1. In case of suspicious financial transactions of the Client or detection of fraud or other criminal actions, the Fund reserves the right to block the Client's account and cancel any executed payment.

4.2. If the data of the sender and the client do not match, the Company may temporarily suspend the movement of funds on the account until the circumstances are clarified by the relevant security services.

4.3. The Company carries out withdrawal of funds only to the account holder's details after successful verification in the system.

5. KYC Policy

5.1. With respect to the right of clients to confidentiality, the Company is obliged to carry out verification of users and the nature of their financial transactions in accordance with the world standards and the current legislation.

5.2. By registering on the Website, the user expresses his/her consent to the "Know Your Client" policy.

5.3. The Company has the right to demand not only confirmation of the client's identity, but also certification that the transactions made by the client do not violate the norms of money laundering and terrorist financing.

6. Final provisions

6.1. All documents received by the Fund in the course of execution of this AML and KYC Policy, as well as information on transactions and checks performed, shall be archived in accordance with the applicable law.