



**Anti-Money Laundering & Know Your  
Customer Policy**

## Anti-Money Laundering & Know Your Customer Policy

### 1. Introduction

midorifx.com operates under the brand name of Midori FX (Pty) Ltd, registered in South Africa under registration number 2023/526901/07 and regulated by the Financial Sector Conduct Authority under license number 53077.

### 2. Scope

2.1. The Anti-Money Laundering & Know Your Customer Policy (the ‘Policy’) is provided by the Company to Clients and Partners, outlining rules and procedures for compliance with Anti-Money Laundering and Terrorist Financing laws (“AML/CFT Laws”) and Know-Your-Client (“KYC”) requirements.

### 3. Anti-Money Laundering (AML) Policy

3.1. The Company is dedicated to preventing money laundering and terrorist financing. Measures include client/partner identification through official documents, verification of permanent addresses, transaction monitoring, and reporting suspicious activities to relevant authorities.

3.2. The Company ensures staff awareness of legal obligations, provides training in AML/CFT laws, KYC procedures, and conducts thorough investigations of suspicious activities.

### 4. Know Your Customer (KYC) Procedures

4.1. Clients and Partners must submit Verification Documents for proof of identity, address, and payment method. The Company may request additional information as necessary.

4.2. All documents must be valid, clear, and meet specific criteria. Failure to comply may result in account restrictions or termination.

4.3. The Company assesses business relationships, constructs economic profiles, and reserves the right to request proof of source of funds.

4.4. Principles include not accepting clients engaged in illegal or unethical activities, requiring informed judgment, and conducting due diligence on potential clients/partners.

4.5. Verification process initiates for deposits exceeding \$5,000. Failure to provide Verification Documents may result in account actions.

4.6. Partners must complete verification before participating in the Partners Program.

4.7. Eligibility for withdrawals requires approved Verification Documents.

- 4.8. Non-compliance may lead to account termination, profit nullification, or other measures.
- 4.9. Additional documents may be requested during the business relationship.
- 4.10. The Company disclaims liability for delays due to pending Verification Documents.
- 4.11. Clients/Partners must provide accurate information, update changes, and breach consequences apply.
- 4.12. Information may be disclosed as required by law, regulatory authorities, fraud prevention, or defense of legal rights.
- 4.13. Company retains data for seven years after terminating the business relationship.

## 4.2 Verification Documents

### Proof of Identity

#### For individuals:

- i. Provide proof of identity, which may include a copy of the national identification card, driver's license, or passport (front and back) issued within the last 10 years.

#### For legal entities:

- i. Submit a recent (up to 3 months) Certificate of Good Standing or a recent (up to 3 months) Bank Statement in the name of the legal entity.
- ii. Provide recent (up to 6 months) Corporate Documents, including the Certificate of Incorporation, Certificate of Directors, Certificate of Shareholders, and Certificate of Registered Address.
- iii. Include the Memorandum and Articles of Association of the Company.
- iv. Present the Resolution of the Board of Directors for opening the account and granting authority to those managing it.
- v. Submit the Declaration of the Ultimate Beneficial Owner.
- vi. Furnish proof of identity for all Company Directors, Ultimate Beneficial Owners (UBOs) holding more than 10%, and the Account Manager.
- vii. Provide proof of address for all Company Directors, UBOs (holding more than 10%), and the Account Manager.

### Proof of Address

- i. Include a utility bill (electricity, water, gas, landline phone, TV/internet), local authority tax bill, property tax, municipality fees, or home insurance documents. This should contain

the full name, residential address, issuing institution/authority, and issue date, with a validity of up to 6 months.

ii. Submit a bank statement/bank confirmation indicating full name, residential address, bank logo or clear stamp, and issue date (valid for up to 6 months).

iii. Attach a certificate of residence issued by the local municipality, police station, etc., with full name, residential address, issuing authority, and clear stamp (valid for up to 6 months).

iv. Provide an affidavit indicating full name, residential address, signature, and stamp of the public notary or government official. Alternatively, any other government-issued document with the specified information can be submitted.

## **5. Transaction Monitoring**

5.1. Electronic monitoring detects and analyses transactions, creating a comprehensive client profile for risk assessment.

5.2. Monitoring includes deposits, withdrawals, wire transfers, and account trading, with enhanced due diligence measures for significant deviations.

5.3. The Company may request additional documents based on monitoring findings.

Note: Please ensure that any specific details or legal language required are properly addressed in the final document.