

TOP 1 Markets

AML Policy

Company: **TOP 1 MARKETS PTY LTD**

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Address: **704 Station St Box Hill VIC 3128(Australia)**

Version: **V.3.1.0**

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1. Introduction

1.1. This Policy applies to TOP 1 MARKETS PTY LTD and any holding companies, subsidiaries or related entities (referred to as we, us, our).

1.2. The Policy extends to and covers all operations and functions of TOP 1 MARKETS PTY LTD. At TOP 1 MARKETS PTY LTD, we are committed to ensuring the confidentiality and security of the personal information supplied to us by individuals. TOP 1 MARKETS PTY LTD is bound by the Australian Privacy Principles contained in the Australian Privacy Act 1988 (Cth) .

1.3. The word “individual” refers to a customer, client, trustee or any other person with whom we come into contact. All contractors, sub-contractors, vendors, service providers, customers, agents or any other third parties that have access to personal information collected by TOP 1 MARKETS PTY LTD must abide by this Privacy Policy.

2. Key Principles

2.1. All of the Company's employees are required to read and acknowledge the Anti-Money Laundering Manual of the Company and shall at all times act under the 'Key Principles' set out therein.

2.2. The Key Principles are:

(a) Take appropriate steps to protect the Company and its domain from any activities which involve money laundering and terrorist financing.

(b) The Company must maintain and implement written policies and procedures with respect to combating money laundering, a system of internal controls to ensure ongoing compliance with applicable laws which shall be reviewed and monitor by a designated person and to take appropriate action, once suspicious activity is detected, through the reporting of such transactions in line with the guidelines set out by Global

Anti- Money Laundering regulations.

(c) Comply with applicable anti-money laundering and terrorist financing laws and regulations as established by the Global Anti- Money Laundering guidelines.

(d) All business units of the Company shall follow the AML policies and procedures.

(e) Report all identified suspicious activities to the extent that it can do so under all applicable foreign and domestic laws.

(f) Compliance with the Company's AML policies will be monitored through a combination of internal audit and regulatory reviews of compliance with relevant anti-money laundering legislation and/or regulations.

(g) Retaining all the customer related documents for a period specified as per the Financial Services Authority St.Vincent and the Grenadines.

(h) The Company does not offer services of opening anonymous accounts.

(i) Full cooperation with law enforcement and regulatory agencies to the extent that it can do so under all applicable laws.

(j) Train staff on Know Your Customer and Anti-Money Laundering policies and new AML laws and regulations.

3.Enquiries

For further AML enquiries please contact us at cs@top1markets.com

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