

Anti-Money Laundering (AML) Policy

BestWing Global

Last Updated: May 01, 2025

1. Purpose and Commitment

BestWing Global ("BWG", "we", or "our") is fully committed to preventing money laundering, terrorist financing, and other forms of financial crime.

This policy outlines our procedures, controls, and responsibilities for detecting, deterring, and reporting suspicious activity in accordance with international AML and Counter-Terrorism Financing (CTF) standards.

BWG complies with the requirements and guidance set forth by the **Financial Conduct Authority (FCA)**, the **Australian Securities and Investments Commission (ASIC)**, the **Financial Sector Conduct Authority (FSCA)**, and the **Financial Action Task Force (FATF)** recommendations.

2. Scope of the Policy

This policy applies to:

- All BWG subsidiaries, branches, and affiliates.
- All employees, contractors, agents, and partners acting on behalf of BWG.
- All clients and counterparties engaging in business with BWG.

The policy covers all products and services offered by BWG, including CFD, Forex, and other derivative trading activities.

3. Customer Due Diligence (CDD)

Before establishing a business relationship, BWG conducts **Customer Due Diligence (CDD)** to verify the client's identity and assess potential risks.

CDD measures include:

- Collection and verification of identification documents (passport, ID card, proof of address).

- Screening against global sanctions, politically exposed persons (PEP), and adverse media databases.
- Risk classification of clients based on geography, transaction volume, and business activity.

Enhanced Due Diligence (EDD) is applied to high-risk clients or complex transactions.

4. Ongoing Monitoring

BWG continuously monitors client activity and transactions to identify unusual or suspicious behaviour.

This includes:

- Real-time transaction monitoring systems to flag irregular patterns.
- Periodic reviews of customer information and account activity.
- Investigation and escalation of alerts to the Compliance Department.

Transactions inconsistent with a client's known profile are subject to enhanced review.

5. Record-Keeping

BWG maintains comprehensive records of all customer identification data, account information, and transaction history for a minimum of **seven (7) years** following the end of the business relationship. Records are securely stored and made available to competent authorities upon request.

6. Suspicious Activity Reporting (SAR)

Employees must immediately report any suspicious transactions or attempted transactions to the designated **Money Laundering Reporting Officer (MLRO)**.

The MLRO is responsible for assessing reports and, where appropriate, filing Suspicious Activity Reports (SARs) or Suspicious Matter Reports (SMRs) with the relevant regulatory or law enforcement authorities.

7. Employee Training and Awareness

All BWG employees receive regular AML/CTF training to ensure they:

- Understand current legal obligations and internal procedures.
- Can identify red flags of money laundering and terrorist financing.

- Know how to escalate concerns in accordance with internal reporting lines.

Training records are maintained, and refresher sessions are conducted annually.

8. Risk-Based Approach

BWG adopts a **risk-based approach** to AML compliance.

This involves assessing the level of risk posed by each customer and tailoring monitoring intensity accordingly. Higher-risk clients and jurisdictions are subject to enhanced scrutiny and due diligence.

9. Sanctions Compliance

BWG strictly adheres to all applicable international sanctions regimes, including those issued by the **United Nations, European Union, OFAC (U.S.), UK HMT**, and relevant local authorities.

No transactions or business relationships will be maintained with individuals, entities, or countries that are subject to sanctions.

10. Governance and Oversight

The AML/CTF program is overseen by the BWG Compliance Department under the authority of senior management and the MLRO.

The Board of Directors receives regular AML compliance reports, ensuring that governance and oversight remain robust and effective.

11. Consequences of Non-Compliance

Failure to comply with AML laws and BWG policies may result in disciplinary action, termination of employment or business relationships, and potential legal prosecution.

12. Review and Updates

This AML Policy is reviewed annually, or more frequently if required by regulatory changes or internal audit findings.

All updates are approved by BWG's senior management and communicated to relevant staff.

For questions regarding this policy, contact **compliance@bestwingglobal.com**.