



## **NAGA Markets Europe Ltd**

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Regulated by the Cyprus Securities and Exchange Commission License no. 204/13

### **AML and Account Verification Policy**

**October 2023**



## 1. INTRODUCTION

- 1.1 NAGA Markets Europe Ltd (hereinafter “NAGA”) is a Cypriot Investment Firm (“CIF”) registered with the Registrar of Companies in Cyprus under number HE 251168 and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 204/13.
- 1.2 NAGA is operating under the Cypriot Law L. 87(1)/2017 titled “Investment Services and Activities and Regulated Markets Law of 2017” which transposed the European Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU, as the same may be in force from time to time and modified or amended from time to time (hereinafter “MiFID II”)
- 1.3 The present document “AML and Account Verification Policy” (hereafter referred to as the “Policy”) is entered by and between **NAGA MARKETS EUROPE LTD** (hereinafter referred to as “Company”) on the one part; and the **CLIENT**, which may be a legal entity or a natural person who has completed the Account Opening Application Form and has been accepted by the Company as a Client on the other part.

## 2. SCOPE

- 2.1 This document is intended to be used as a framework for the Company’s obligation to combat Money Laundering and Terrorist Financing. It shall set out the processes and procedures that the Company’s employees shall follow.

## 3. PERSONAL DATA

- 3.1 Your privacy is of utmost importance to us, and it is our priority to safeguard and respect the confidentiality of your information, your privacy, and your rights. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of your personal information as illustrated herein. Please be



ensured that the reason for the identification procedure is to comply with laws combating Money Laundering and Terrorist Financing.

#### 4. VERIFICATION

**4.1.** In accordance with the provisions of Article 62(1) of the Law, the verification of the identity of the customer and the beneficial owner is performed before the establishment of a business relationship or the carrying out of the transaction. By way of derogation to the general rule of Article 62(1) of the Law, and by virtue of Article 62(2) of the Law, the verification of the customer's/beneficial owner's identity may be completed during the establishment of a business relationship, so as not to interrupt the flow of business.

**4.2.** Irrespective of the client's risk categorization, the below due diligence measures shall always be undertaken:

- i. Identification of the customer and verification of his identity on the basis of documents, data or information obtained from a reliable and independent source.
- ii. Where applicable, identification of the Beneficial Owner and verification of his identity to ensure that the Company knows who the Beneficial Owner is, and this shall include legal persons, trusts, companies, foundations and similar legal arrangements.
- iii. Establishing the purpose and intended nature of the business relationship.
- iv. Conducting on-going monitoring of the business relationship, including scrutiny of transactions undertaken throughout the course of the relationship, in order to ensure that the transactions being conducted are consistent with the company's knowledge of the customer, the business and risk profile, including where necessary, the source of funds and ensuring that the documents, data or information held are kept up to date.

#### **4.3 The type of documents needed will depend on the type of your account**

Prior to the client's approval, the BO shall assess the Due Diligence Documentation provided by the user during the Company's Onboarding Policy. Specifically, the BO shall assess the following:

- i. Identification Document, so called Proof of Identity (the "POI");
- ii. Recent (issued within the last 6 months) utility bill, bank statement or local authority tax bill, which states the client's name and residential address, (the "POR");
- iii. Source of funds (the "SOF"), evidencing where the client obtained the funds he/she used to deposit (if applicable – only requested in the event that a client deposits an aggregate amount exceeding 50,000 units of their currency); and
- iv. Any documentation that is ad – hoc requested by the Compliance Department, during the onboarding procedure.

Proof of Identity (POI):



The following documentation shall be considered as acceptable POI:

- Valid and not expired Passport; and
- A valid and not expired Identity Card.

In addition to the above, the Company shall accept a client's Driving License as POI, in extreme circumstances, for countries which do not issue identity cards, such as Denmark, Iceland and Ireland.

The proof of identity must be issued by a governmental body. The document should contain the full name, photograph, full date of birth, date of expiry, date of issue, document number, security strip, so called "MRZ lines" signature and personal number. Both, a copy of the front and the back sides of the document, are required, in a clear and readable coloured copy.

Proof of residence (POR):

Proof of residence is considered as being a document issued by an institution/company or by the government, which the client receives at least monthly at the address where he/she resides (home address). The BO shall ensure that the "Country by IP", stated in the CRM matches the client's country, as stated on the POR document. In case the client's IP is not consistent with his/her residency, the BO shall proceed with obtaining an "IP Clarification", by requesting a clarification from the client.

The POR must clearly show:

- Full name of the customer;
- Full address of residence – should match with the one provided in CRM;
- Date of issue (not older than 6 months); and
- Issuing company/institution (logo, stamp, details of the company – address, website, phone number).

When reviewing the POR, the BO must compare whether the details registered in CRM match those provided in the POR. If there is a mismatch between the address on the POR and the one registered in

CRM, then an address verification shall be requested from the client, by sending an email to his/her registered e-mail. Following the client's response, a screenshot of the e-mail received from the client should be uploaded to CRM. The BO shall also assess whether the POR is valid, if there are any modifications and/or edits, if it is recent and not older than 6 months and if the copy is readable (i.e., all characters are clear to read). If the

client has provided a POR under the name of a third party, such document cannot be approved. The client should be notified via e-mail from the CRM and requested to send a valid POR, where his/her name and address should be clearly stated.

The following non – exhaustive list constitutes a valid POR: Electricity bill, Gas bill, Water bill, Internet bill, Landline bill, Garbage and any other bills for the house, House insurance, Life insurance, Residence certificate from the city hall or relevant institution, Bank account statement, swift, Bank letter, Any statement or letter from credit institutions and Tax bill or any other official document issued by the government or regional authority (statement, letters, certificates).

**\* Note: the above documents prescribe our minimum requirements. Company reserves its right to request any further documents deemed necessary.**

Deposits and Withdrawals Methods:

- i. Debit and Credit Card
- ii. PayPal
- iii. Neteller
- iv. Skrill
- v. eWallets
- vi. Wire Transfers

If funding with a credit or debit card, a client should send us a copy of both sides of their card. The copy needs to have the name, date of expiry, last four digits on the front and signature on the back clearly visible. The abovementioned is needed in order to be certain that all transfers are made only to and from your card.

For your security, we advise you to cover the card number except for the last four digits and the CVV code on the back.

In case a client deposits with bank wire, a confirmation should also be provided.

#### Additional queries

If you have any questions with reference to the documents stated above, please contact our support team at [support@naga.com](mailto:support@naga.com). Documents should be provided as soon as possible so that we can avoid any delays to your transactions. KYC documents should be scanned or photographed with all edges visible and sent to [support@naga.com](mailto:support@naga.com).