



Information for Clients regarding Company's Anti-Money Laundering Procedures

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I. INTRODUCTION

“Up Trend” Ltd. (hereinafter called the “Company” or “Up Trend” or “we” or “us”) is a Bulgarian Investment Firm (“BIF”), a company incorporated and registered under the laws of Republic of Bulgaria under UIC 121527003 having its registered office at 51A Nikola Y. Vaptsarov Blvd., 1st floor, Lozenets district, Sofia, Bulgaria, holder of investment firm license by decision № ПГ-03- 110 of the Bulgarian Financial Supervision Commission (hereinafter “FSC”). Ainvesting is a registered brand of the Company for providing trading services in CFDs offered by the Company on its website Ainvesting.eu

II. WHAT IS MONEY LAUNDERING

Money laundering occurs when funds from an illegal/criminal activity are moved through the financial system in such a way as to make it appear that the funds have come from legitimate sources.

Money Laundering usually follows three stages:

- Firstly, cash or cash equivalents are placed into the financial system.
- Secondly, money is transferred or moved to other accounts (e.g. futures accounts) through a series of financial transactions designed to obscure the origin of the money (e.g. executing trades with little or no financial risk or transferring account balances to other accounts).
- Finally, the funds are reintroduced into the economy so that the funds appear to have come from legitimate sources (e.g. closing a futures account and transferring the funds to a bank account).

Trading accounts are one vehicle that can be used to launder illicit funds or to hide the true owner of the funds. In particular, a trading account can be used to execute financial transactions that help obscure the origins of the funds.

III. OUR APPROACH

Ainvesting will fight against money launderers as it does not support nor accept money laundering.

Accordingly, the Company has policies in place to identify and prevent people from laundering money such as:

- Ensuring and maintaining clients' valid proof of identification.
- Checking clients' names against lists of known or suspected terrorists.
- Informing its clients that the information they provide may be used to verify their identity.
- Closely monitoring clients' money transactions.
- Taking steps to ensure the funds that clients use for their trades come from legitimate legal sources of income.
- Requiring additional information and/or documentation in order to satisfy the requirements and goals of local and EU AML legislation.
- The Company has implemented a compliance program to deter, detect and report potential suspicious activity, money laundering and financing of terrorism that includes policies such as collecting and maintaining a valid proof of customer identification, including but not limited to:
 - Valid IDs;
 - Proof of permanent address (not older than three months);
 - Proof of a bank account/credit card opened in the name of the account owner;
 - Documents, clearly establishing the source of funds

Please note that in the event of a change of the submitted information the Client must promptly notify the company and submit the up-to-date documents.

The Company may request additional information in cases of, but not limited to:

- When establishing relations with politically engaged persons (PEP);
- Where unusually large or frequent transactions occur;
- Where transactions occur with no economic reason;
- Where the company is notified of or suspects money laundering or terrorist financing actions have occurred;
- Where additional information is required on the clients source of funds, used for trading with the Company;

- At its discretion, the Company may request any further information from the client.

Additionally, Ainvesting executes funds withdrawals back to the original source of remittance, as a preventative measure.

For questions/comments regarding these guidelines, contact our Compliance at compliance@ainvesting.eu