



ANTI-MONEY LAUNDERING 反洗钱政策



Money Laundering is the process by which individuals attempt to conceal the origin and ownership of proceeds of illegal activity. Generally, money laundering involves any financial transaction:
洗钱活动（洗黑钱）指的是个人企图掩盖非法活动来源和所有权的过程。一般来说，洗钱将涉及以下的金融交易行为：

Using funds derived from criminal activity; or
使用犯罪活动所得的资金；或者

Conducted to facilitate or conceal criminal activity.
为了促成或隐瞒犯罪活动。

Money laundering activity is highly regulated by global and international legislation therefore any Company is strongly advised to implement AML Code of Practice, to avoid legal procedures and sanctions in the future.
洗钱活动受到全球和国际法律的高度管制，因此，任何公司都被强烈建议实施反洗钱行为守则，以免日后触犯任何法律程序和制裁。

The risk of Money Laundering by criminal elements through the company is the exploitation of the deposit/withdraws procedures made available by the Company, and the opportunity to present to law enforcement and tax entities that the source of the funds coming from the Company, is profit made in the Forex Markets.

犯罪分子借由公司洗钱而引起的风险，是利用了相关公司提供的存款/提款程序，乘机向执法和税收机构展示，其资金是源自该公司在外汇市场中所赚取的利润。

For example- If the Company would allow a deposit of one entity to be credited to another entity' s trading account, then the entity that owns the trading account can withdraw those funds to its own bank account, and report them as profits. This will disconnect the flow of funds from the depositing entity to the withdrawing entity. Criminal elements may use that option to transfer funds undetected by law enforcement agencies and conceal the true origin of the funds. The same applies to transfer of credit between accounts belong to different entities etc.

举例说，如果公司允许将一个实体的存款被记入另一实体的交易账户，那么拥有交易账户的实体就可以将这些资金提取后转至自己的银行账户，并将之呈报为利润所得。这将中断了资金从存款实体转至提款实体的流向。犯罪分子可能会利用此选项，将资金转移到执法机构未能检测的地方，并隐瞒资金的真实来源。上述情况也同样适用于不同实体之间的信贷转移等案例。

To avoid such abuse of the Company, the rule of thumb is not to allow the transfer of funds between different entities. For that, the Company must implement KYC (" know Your Client") procedures.

为了避免对公司的滥用，首要法则就在于：不容许不同实体之间转移资金。为此，公司必须实施“了解你的客户”程序（KYC）。

“Know Your Client” Procedures

“了解你的客户”程序

The customers of the Company are subdivided in two categories:

公司的客户分为两类：

Private Customers (natural persons) residents of any country.

任何国家的私人客户（自然人）。

Corporate Customers (legal entities) residents of any country.

任何国家的企业客户（法人）。



If the customer is a private person (natural person) the following documents must be collected:
若是私人（自然人）客户，必须收集以下文件：

Full name details.
完整的姓名信息。

ID number, and/or passport number (original or certified copies).
身份证号码、和/或护照号码（原件或经核证副本）。

Proof of residency- Copy of utility bill.
住处证明- 费用账单的副本。

Swift confirmation of the bank transfer. The information of the bank account showed on the SWIFT must be identical to (a) and (b) above. Otherwise, the deposit must be returned to the same bank account it came from, immediately, without crediting the trading account.

SWIFT 银行转帐确认。SWIFT 所显示的银行账户信息必须与上述（a）和（b）相同，否则必须将存款立即返还至其同一来源银行账户，而不记入交易账户。

Withdrawals must be made to the same bank account the money was deposited from (to prevent money transfer between different entities' bank accounts, through the Company), and in the same currency (to prevent currency changes through the Company).

提款必须转入至之前存款的同一银行账户（以防止在不同实体的银行账户之间转账），并且采用相同的货币（以防止通过公司而出现的货币变化）。

If the original account is no longer available, funds may be transferred to a different account of the same entity (you will need to get a copy of a check or other instrument proving the new account ownership), in the same currency and into the same country the original deposit was made from.

如果原始的账户不再可用，资金可被转移到相同实体的不同账户（而你需要出示一份支票或其他工具的副本来证明新账户的所有权），并且是以相同的货币，以及依照原始存款来源国转至相同的国家。

If the customer is a corporation (legal entity) the following documents must be collected:
若是企业（法人）客户，则必须收集下列文件：

All statutory documents (Certificate of incorporation, memorandum and articles of association), and amendments to them (original or certified copies).
所有法定文件（公司的注册证书、章程大纲及细则）及相关的修正文件（原件或经核证的副本）。

Details on the shareholders, directors and ultimate beneficial owners (same details as those for natural persons described below).

关于股东、董事和最终受益人的详细信息（与下述自然人的信息相同）。

Powers of attorney for the persons carrying out interaction with the Company on behalf of the Customer (issuing orders, signing documents for opening the account and other procedures).

代表客户与公司进行互动的人员委托书（发出订单，签署开立账户的文件和其他程序）。



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FAQ - Frequently Asked Questions

常见问题

One can NOT deposit from a company he owns to his personal trading account, and vice versa.
任何人不能从他拥有的公司存入他的个人交易账户，反之亦然。

One cannot get deposits from his brother/mother/other relative bank account; unless that relative joins the trading account (signs the trader agreement).

任何人不能从他的兄弟/母亲/其他相关的银行账户中获得存款；除非该亲属加入交易账户（签署交易者协议）。

Cash deposits to the Company's account by traders are forbidden. If such a deposit did occur, then in case of a withdrawal request, the trader will need to supply bank account details of the person who made the cash deposit, with a written proof of the account details (check, credit card etc.).

交易者禁止向公司账户提供现金存款。若这类存款确实发生而出现提款要求，交易者需要提供该现金存款者的银行账户信息，当中包含书面证据方式的账户细节（如支票、信用卡等）。

Do not credit a trading account before the deposit was complete (i.e. the required business days (usually three) have passed following the deposit). Do not credit the trading account based on future payments or checks.

请勿在存款完成之前记入交易账户（即在存款之后过了规定的营业时间（通常为3个工作日）。请勿根据未来的付款或支票记入交易账户。

A client cannot transfer funds between trading accounts not under his own name.

任何客户不得以非自己的名义在交易账户之间转移资金。

