



# **ANTI-MONEY LAUNDERING POLICY**

**November 2025**

## 1. Introduction

1.1 In2Markets Ltd (“Company”) is a Cyprus Investment Firm (“CIF”) incorporated and registered under the laws of the Republic of Cyprus with registration number HE 333743. The Company is regulated by the Cyprus Securities and Exchange Commission under licence number 263/14 is authorised to provide services and perform activities specified in our licence.

The business name IN2MARKETS LTD and the domain name [www.In2Markets.com](http://www.In2Markets.com) shown on CySEC portal are owned by the Company.

1.2 The Investment Services that Company provides to its Client are:

- reception and transmission of orders in relation to one or more financial instruments;
- execution of orders on behalf of clients;
- portfolio management.

The Company provides also the following Ancillary Services:

- safekeeping and administration of financial instruments, including custodianship and related services;
- granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction;
- foreign exchange services where these are connected to the provision of investment services.

1.3 All transactions, including account funding and trade executions, are conducted electronically.

1.4 This Policy is a fundamental part of our overall compliance framework and applies to every Client of the Company. It is essential that all Clients review and understand this Policy before engaging in any transactions.

## 2. Money Laundering and Terrorist Financing (ML/TF)

2.1 Money laundering refers to the process of concealing, disguising, converting, transferring, or using proceeds derived from criminal activities to make them appear legitimate and avoid legal detection. It is a criminal offense under EU Anti-Money Laundering Directives and CySEC regulations, applicable to CIFs.

Money laundering typically involves three main stages, which may occur sequentially, simultaneously, or overlap:

Placement – introduction of illicit funds into the financial system through deposits, structured transactions, or other financial instruments.

Layering – concealment of the origins of illicit funds through a complex network of transactions, including wire transfers, cryptocurrency mixing services, trade-based money laundering, and the purchase of high-value assets.

Integration – reintroduction of laundered funds into the legitimate economy through seemingly legal transactions, such as false invoicing, shell companies, or real estate acquisitions.

The Company has established effective monitoring and reporting systems to identify and mitigate money laundering risks, ensuring compliance with regulatory requirements and maintaining the integrity of its financial operations.

2.2 Terrorist Financing involves the provision, collection, or movement of funds, from either legitimate or illegitimate sources, with the knowledge or intention that they will be used to support terrorist activities, organizations, or individuals. Unlike Money Laundering, which seeks to conceal the illicit origins of funds, terrorist financing often involves legal funds being directed toward illegal purposes.

### 3. Objectives and scope of policy

#### 3.1 Objectives of this Policy are:

- To ensure full compliance with applicable Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Laws and regulations.
- To establish and maintain robust internal procedures, controls, and systems for detecting and preventing money laundering and terrorist financing.
- To protect the Company's reputation and secure its online trading operations.
- To maintain transparency and cooperation with regulatory authorities.

3.2 This Policy applies to all business relationships and electronic transactions conducted by the Company with its Clients. It governs the identification, verification, monitoring, and reporting of suspicious activities and transactions.

### 4. Legal and regulatory framework

4.1 The Company strictly adheres to all applicable laws, directives, and regulations related to AML/CFT, including but not limited to:

- AML Directives. The Fifth Anti-Money Laundering Directive (Directive (EU) 2018/843) strengthens customer due diligence measures, enhances transparency of beneficial ownership, and improves cooperation between Financial Intelligence Units (FIUs); The Sixth Anti-Money Laundering Directive (Directive (EU) 2018/1673) expands criminal liability for money laundering offenses and introduces stricter penalties.
- CySEC AML Directives. The Cyprus Securities and Exchange Commission (CySEC) AML Directive establishes rules for CIFs to prevent the misuse of financial systems for money laundering and terrorist financing; CySEC regularly issues circulars and guidelines, which the Company integrates into its internal AML procedures.

- Markets in Financial Instruments Directive II (MiFID II). Directive 2014/65/EU sets transparency requirements and reporting obligations for investment firms to enhance market integrity and investor protection.
- Financial Action Task Force (FATF) Recommendations. The Company follows FATF's global standards to combat financial crime and mitigate ML/TF risks.
- The Company ensures that its Policy remains up to date with evolving regulatory requirements and industry best practices through a structured review process:
- Compliance officers continuously track updates from CySEC, the European Commission, FATF, and other relevant bodies.
- The AML Policy is reviewed at least annually or whenever significant regulatory changes occur.
- The Company assesses emerging ML/TF risks and adjusts internal controls accordingly.
- Any amendments to the AML Policy must be reviewed and approved by senior management and, if necessary, submitted to CySEC for compliance verification.

The Company remains committed to maintaining robust AML/CFT measures and continuously improving its compliance framework.

4.2 The Company reserves the right to amend this Policy to reflect changes in the legal or regulatory environment.

### 5. Company obligations

5.1 The Company is committed to:

- Establishing and maintaining a robust AML/CFT framework that is fully integrated into its online trading operations.
- Conducting risk assessments and implementing a risk-based approach to detect and prevent illicit activities.
- Utilizing advanced, automated systems for transaction monitoring and internal control.

- Reporting any suspicious transactions to the appropriate authorities as required by law.
- Ensuring that all employees receive regular AML/CFT training.

5.2 The Company's online trading platform ensures that all transactions (including account funding and trade executions) are processed electronically, providing a high degree of transparency and auditability.

## 6. Client obligations

6.1 Clients must provide accurate, complete, and up-to-date information regarding their identity, financial status, and source of funds.

6.2 Clients are required to complete our "Know Your Client" process and submit supporting documentation for identity and address verification.

6.3 Clients must promptly notify the Company of any changes in the information provided that may affect the risk assessment.

6.4 Clients agree to cooperate fully with the Company's AML/CFT procedures and to provide additional documentation or clarification upon request.

## 7. Know Your Client (KYC) Policy

### 7.1. Client Identification and Verification:

- The Company collects and verifies identification documents (e.g., passport, driver's license) and proof of address (e.g., utility bill, bank statement) from all Clients.
- For legal entities, additional documentation such as corporate registration and details of beneficial owners is required.

### 7.2 Enhanced Due Diligence:

- Enhanced procedures are applied to high-risk Clients, including Politically Exposed Persons and those from high-risk jurisdictions.

### 7.3 Ongoing Monitoring:

- The Company continuously reviews and updates Client information to ensure ongoing compliance with AML/CFT standards

## 8. Risk Assessment and Management

8.1 The Company employs a risk-based approach to assess and mitigate the risks associated with money laundering and terrorist financing.

### 8.2 Risk Factors Considered:

- Client's geographic location and jurisdiction.
- Nature, volume, and frequency of transactions.
- Source of funds and overall wealth.
- Client profile, including occupation and risk rating.

8.3 Clients are categorized into risk levels (low, medium, high) based on the assessment, with enhanced due diligence applied for high-risk Clients.

8.4 The Company reserves the right to refuse to process a transfer of funds at any stage if it believes it to be connected in any way to criminal activities or money laundering.

8.5 Third party or anonymous payments shall not be accepted. If the Company is not satisfied that you are the sender of the money it reserves the right to reject the money and return it to the remitter less any transfer fees or other charges, the Company further reserves the right to terminate your account held with Us with immediate effect.

8.6 The Company is obliged to report all suspicious transactions and is prohibited from informing the client that they have been reported for suspicious account activity. Account misuse may result in criminal prosecution.

8.7 The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

## **9. Internal control and monitoring**

9.1 The Company has established comprehensive internal controls and automated monitoring systems to detect suspicious transactions.

9.2 Regular internal audits are conducted to assess the effectiveness of AML/CFT procedures and to ensure compliance with regulatory standards.

9.3 Suspicious Activity Reports are prepared and, when required, submitted to the relevant regulatory authorities

## **10. Employee training**

9.1 All employees receive regular AML/CFT training tailored to their roles within the online trading environment.

10.2 The training program is updated periodically to address emerging risks, changes in regulation, and improvements in internal processes.

## **11. Record retention**

11.1 The Company retains all relevant Client information and transaction records for a minimum of five (5) years after the termination of the business relationship or the date of transaction execution.

## **12. Confidentiality and cooperation**

12.1 All Client information collected for AML/CFT purposes is treated as strictly confidential and is used solely for compliance with applicable laws.

12.2 The Company cooperates fully with regulatory and law enforcement authorities in investigations of suspicious activities.

## **13. Policy review and amendments**

13.1 The Company reserves the right to review and amend this Policy at its sole discretion to ensure its continued compliance with current regulatory requirements and internal risk management practices.

13.2 Significant changes to the Policy will be communicated to Clients through the Company's website and other established channels.

## **14. Contact information**

14.1 For any questions or additional information regarding this Policy, please contact at:

Email: [support@In2Markets.com](mailto:support@In2Markets.com)

Telephone: +357 26221007

Website: [www.in2markets.com](http://www.in2markets.com)

**IN2MARKETS LTD**

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