



AML and CTF Policy

**Information in relation
To Anti-Money Laundering and to Counter-
Terrorism Financing**

Version 0.1 – June 2024



Capital Crest Ltd operating under the trading name Mirrox is a limited liability company registered with the registrar of International Business Companies in Comoros Union, with registration number HT00324037 (hereinafter referred to as the “Company”) and is authorised by the Mwali International Services Authority of Comoros (hereafter referred to as the “Regulator”), with an international brokerage and clearing house license number BFX2024064.

The Company is committed to ensuring the privacy, confidentiality, and security of its clients' information both during and after their interaction with the Company, to the greatest extent possible. Concurrently, the Company is required to comply with specific regulations set by the local regulator to prevent and suppress money laundering activities. Consequently, the Company adheres to stringent Anti-Money Laundering (AML) and Counter-Terrorism Financing procedures and must obtain certain verification information and documentation.

The Company verifies the identity of all clients' accounts and does not continue the business engagement with such accounts unless this requirement is met, as outlined in the AML Policies and legislative requirements. Procedures are in place to obtain appropriate evidence and maintain adequate records of client identities and transactions to assist in the investigation of criminal offenses if necessary.

The Company has implemented policies and procedures to detect and avoid money laundering transactions and ensure compliance with relevant legislative requirements issued by its regulator.

The Company is diligent in preventing its involvement in money laundering activities and does not knowingly accept assets or engage in business relationships if there is reasonable cause to believe that the assets may have been acquired illegally or may represent the proceeds of criminal activity.

The Company will promptly report any suspicious transactions related to any account to the Supervisory Authority, if there is suspicion that the source of funds is criminal or that a client is involved in criminal activity, the Company will follow established procedures to assess the evidence and determine the appropriate course of action.

The Company maintains records of reports made by staff and to the Supervisory Authority. It will establish and verify the identity of any client by requiring identification records (e.g., passport, ID, driving license). The Company reserves the right to request any additional documentation deemed necessary at any point in the business relationship.

The Company shall:

1. Obtain information on the purpose and nature of the business relationship when establishing a new business relationship.
2. Adequately identify and verify the identity of any natural person conducting a transaction, including information such as:
 - The person's full name and residential address;
 - National identity card, social security document, passport, or other official identifying document.
3. Adequately identify the beneficial owner of any legal entity conducting a transaction with the Company and take reasonable measures to verify its ownership and control structure, including information such as:



- The customer's name, legal form, head office address, and identities of directors;
 - Principal owners and beneficiaries, and control structure;
 - Provisions regulating the power to bind the entity and verify that any person acting on behalf of the customer is authorized, and identify those persons;
4. Have appropriate risk management systems to determine if a customer or beneficial owner is a politically exposed person, and if so, shall:
- Adequately identify and verify their identity as set out in this section;
 - Obtain senior management approval before establishing a business relationship with the politically exposed person;
 - Take reasonable measures to establish the source of funds and property; and
 - Conduct regular enhanced monitoring of the business relationship.

Should you require any further information or have any questions about this document, please contact us at support@mirrox.com.