



International
Investment
Market

ANTI-MONEY LAUNDERING (AML) & CTF POLICY

IVM — International Investment Market
ULTRA PRO • Full Policy (Integrated)

Overview

This Policy is in accordance with international AML/CFT principles, laws, regulations and directives. IVM adopts controls, practices and procedures that promote high ethical standards and prevent misuse of the platform for financial crime. A risk-based KYC framework underpins customer acceptance, identification, verification and ongoing monitoring.

1. Customer Acceptance Policy

IVM maintains clear customer acceptance policies and procedures, including identification of higher-risk customers. Prior to onboarding, due diligence considers: customer background, country of origin, PEP status, age (18+), linked accounts, business activities and other risk indicators. Enhanced Due Diligence (EDD) applies to high-risk countries, PEPs, complex structures and high net worth clients with unclear source of funds. Decisions to onboard higher-risk clients are escalated to senior management. Funds must be transferred through reputable banking channels. Back-office reviews documentation for identification/verification, and deposit methods are assessed to prevent suspicious activity.

2. Customer Identification

Customers include account holders, beneficial owners, beneficiaries of intermediary transactions, and any party connected to a transaction posing risk. IVM maintains systematic procedures for identification and verification prior to establishing a relationship. Robust documents are required; non-resident customers receive enhanced scrutiny. No account is activated without satisfactory verification. Records are periodically reviewed, especially upon significant transactions or material changes. Where information is insufficient, immediate remediation is required. All new clients/accounts are approved by a senior compliance officer/AML officer; high-risk cases require senior management approval.

3. Ongoing Monitoring, PEP & Sanctions Screening

IVM monitors account activity on an ongoing basis to detect transactions that do not conform to expected behavior. **PEP Screening:** Clients are screened at onboarding and continuously against global PEP databases; identified PEPs are subject to EDD and enhanced monitoring. **Sanctions Screening:** Clients and transactions are screened against OFAC, EU, UN and UK HMT lists at onboarding and on an ongoing basis using third-party compliance systems. **Transaction Monitoring:** Automated and manual controls detect suspicious patterns; alerts are investigated and escalated.

4. Record Keeping

IVM maintains clear standards for records of customer identification and transactions. Copies of identification documents are retained for at least seven (7) years after account closure. Transaction records are retained for at least seven (7) years after relationship termination or transaction completion.

Regulatory Notice: This policy reflects IVM's AML/CTF framework. Licensing status and requirements may vary by jurisdiction.

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