

## **COLLINSON FOREX ANTI-MONEY LAUNDERING POLICY**

It is the policy of Collinson to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Collinsons' is committed to AML(anti-money laundering) compliance in accordance with applicable law and requires its officers , employees and appointed agents to adhere to these standards in preventing the use of its services for money laundering purposes.

For the purpose of the policy , money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to be derived from legitimate origins or constitute legitimate assets.

Generally , money laundering occurs in three stages. Cash first enters the financial system at the “placement” stage , where the cash generated from criminal activities is converted into monetary instruments , such as money orders or travellers cheques , or deposited into accounts at financial institutions. At the “layering” stage , the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin. At the “integration” stage , the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses.

Terrorist financing may not involve the proceeds of criminal conduct , but rather an attempt to conceal the origin or intended use of funds , which will be later used for criminal purposes.

### Customer Identification Process

- Name
- Date-of-birth
- Confirm legitimacy through visit to business or personal premises
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### Monitoring and Reporting

Transaction based monitoring will occur within the appropriate business units of Collinsons. Monitoring of specific transactions will include but is not limited to transactions aggregating NZ\$50,000 or more and those with respect to which Collinsons has a reason to suspect suspicious activity. All reports will be documented and retained.

- Validate authenticity of actual Foreign Exchange currency flows in the company or individual
- Any “Red Flag” investigated thoroughly and verified.