ANTI-MONEY LAUNDERING & COUNTER-TERRORIST FINANCING POLICY

Roventar Trade

1. Policy Statement

Roventar Trade is committed to preventing its services, accounts, systems and business relationships from being used for money laundering, terrorist financing, fraud, sanctions evasion or other unlawful financial activity. Roventar Trade adopts a risk-based Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) framework and will apply appropriate customer identification, verification, monitoring, record-keeping, escalation and reporting controls in accordance with the laws, regulations and regulatory requirements applicable to the relevant Roventar Trade legal entity and jurisdiction.

2. Customer Due Diligence (KYC/CDD)

Before establishing or continuing a customer relationship, Roventar Trade may obtain and verify reliable identification information and, where applicable, identify and verify beneficial owners. The company may obtain information regarding the purpose and intended nature of the relationship, occupation or business activity, expected account activity, source of funds and, for higher-risk cases, source of wealth. Enhanced due diligence may be applied to higher-risk customers, jurisdictions, transactions and politically exposed persons (PEPs).

3. Transaction Monitoring

Roventar Trade may monitor deposits, withdrawals, transfers, account activity and other relevant transactions on an ongoing, risk-sensitive basis. Activity that is unusually large, complex, inconsistent with the customer's known profile, structured to avoid controls, involves unexplained third parties, or otherwise presents financial-crime indicators may be reviewed and escalated under internal compliance procedures.

4. Suspicious Activity Reporting

Where Roventar Trade identifies reasonable grounds for suspicion of money laundering, terrorist financing or other reportable financial crime, the matter will be escalated to the designated compliance function. Where required by applicable law, a suspicious transaction or activity report will be submitted to the competent Financial Intelligence Unit or other authorized authority. Roventar Trade will observe applicable confidentiality and anti-tipping-off requirements.

5. Sanctions and PEP Screening

Roventar Trade may screen customers, beneficial owners and relevant counterparties against applicable sanctions, politically exposed person and other risk databases. Potential matches will be reviewed through a risk-based process. The company may reject, restrict, suspend or terminate a relationship where required by applicable law, sanctions obligations, regulatory direction or internal risk controls.

6. Record Keeping

Roventar Trade will retain customer identification and verification records, account and transaction records, compliance reviews and related documentation for the period required under the laws and regulations applicable to the relevant legal entity. Records should be sufficient to support lawful regulatory review and, where required, reconstruction of relevant transactions.

7. Internal Controls and Cooperation

Roventar Trade will maintain proportionate internal controls, compliance oversight, escalation procedures and employee awareness or training appropriate to its activities and risk profile. The company will cooperate with competent authorities when lawfully required and will periodically review its AML/CFT framework to reflect material changes in law, regulation, products, jurisdictions and identified risks.

Legal & Compliance Notice

This is a general company AML/CFT policy template. It does not state or imply that Roventar Trade holds a particular financial-services licence or regulatory authorization. Before official publication, onboarding use, or submission to a bank, payment provider, regulator or business partner, the document should be reviewed and adapted by qualified legal/compliance personnel to the exact Roventar Trade legal entity, registered jurisdiction, regulator/licence (if applicable), reporting authority, statutory record-retention period and governing AML/CFT legislation.

Reference framework: International AML/CFT principles, including a risk-based approach, customer due diligence, beneficial ownership controls, ongoing monitoring and suspicious transaction reporting.