



Novotrend

Anti-Money Laundering (AML) Policy

Beachmont, Kingstown
St. Vincent and the Grenadine
Novotrend LTD
Nº 23835 IBC 2017

Novotrend Ltd

Registration No.: 23835 IBC 2017

Registered Address: Suite 305, Griffith Corporate Centre, P.O. Box 1510, Beachmont Kingstown, St. Vincent and the Grenadines

Physical Office: Office #5, Fifth Floor, Rukiri II Cell, AMAHORO Village, Remera Sector, City of Kigali, UPI 501, Rwanda

Website: www.novotrend.co

1. Purpose of the Policy

The purpose of this Anti-Money Laundering (AML) Policy is to establish procedures and internal controls designed to prevent and detect money laundering, terrorist financing, and other illicit financial activities in accordance with international AML standards and best practices.

Novotrend Ltd ("the Company") is committed to full compliance with the laws and regulations relating to anti-money laundering and combating the financing of terrorism (AML/CFT) as prescribed by international standards including the Financial Action Task Force (FATF).

2. Company Overview

Novotrend Ltd is a financial and technology services provider registered in St. Vincent and the Grenadines under registration number **23835 IBC 2017**, with additional operational presence in Kigali, Rwanda. The Company operates under the brand **Novotrend** and provides online trading and financial technology solutions to clients globally, except in restricted jurisdictions.

3. Regional Restrictions

In compliance with international sanctions and regulatory requirements, **Novotrend Ltd does not provide services to residents or entities located in the following regions:**

- The **United States of America**
- **Canada**
- **Sudan**
- **Syria**
- **North Korea**
- Any country within the **European Economic Area (EEA)**

Furthermore, the Company's activities are conducted **outside the Russian Federation** and are not directed toward residents of that jurisdiction.

4. AML Compliance Principles

Novotrend Ltd upholds the following principles in its AML framework:

1. Customer Due Diligence (CDD):

- Verification of customer identity before establishing any business relationship.

- Collection of valid identification documents and proof of address.
- Application of Enhanced Due Diligence (EDD) for high-risk clients and politically exposed persons (PEPs).

2. Know Your Customer (KYC):

- Detailed KYC procedures are conducted to verify and validate client information.
- Ongoing monitoring of client activities to ensure they are consistent with the client's profile and risk level.

3. Record Keeping:

- All customer identification documents, transaction records, and communications are securely retained for a minimum period of five (5) years after the termination of the business relationship.

4. Transaction Monitoring:

- Continuous monitoring of all transactions to identify suspicious or unusual activity.
- Immediate reporting of any suspicious activity to the relevant financial intelligence unit (FIU) in accordance with applicable laws.

5. Training and Awareness:

- Employees and partners are regularly trained on AML/CFT obligations, internal policies, and procedures to ensure full compliance.

5. Reporting of Suspicious Activities

Any employee who identifies suspicious transactions or activities must immediately report such instances to the designated **Compliance Officer**.

The Compliance Officer is responsible for reviewing, investigating, and escalating such reports to relevant regulatory or law enforcement authorities when warranted.

6. Data Protection and Security

Novotrend Ltd places a high priority on the protection of personal data.

- All user information is stored securely and processed in compliance with applicable data protection laws.
- The website is protected by a valid **SSL certificate**, ensuring that all data transmission is encrypted and conducted via a secure protocol (HTTPS).
- Access to client data is strictly limited to authorized personnel only.

7. Risk-Based Approach

Novotrend Ltd implements a **risk-based approach** to AML compliance by:

- Assessing the level of risk associated with each client, product, or service.
- Applying enhanced monitoring and due diligence for higher-risk customers or jurisdictions.
- Reviewing and updating internal AML controls regularly to align with global regulatory developments.

8. Prohibition of Third-Party Transactions

The Company strictly prohibits transactions conducted on behalf of third parties. All deposits and withdrawals must be made using payment accounts registered in the customer's own name. Any attempt to use anonymous or third-party accounts may result in immediate termination of services.

9. Cooperation with Regulatory Authorities

Novotrend Ltd cooperates fully with financial regulators, law enforcement agencies, and international bodies to detect, prevent, and report financial crimes, including money laundering and terrorist financing.

10. Policy Review

This AML Policy is subject to regular review and updates as necessary to reflect changes in laws, regulations, and best practices. The Compliance Officer ensures that any revisions are communicated to all relevant personnel.

Contact Information

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