



Anti-Money Laundering Policy

It is the policy of UTRUST Switzerland AG (UTRUST) that all members of staff shall actively participate in preventing the services of UTRUST from being exploited by criminals and terrorists.

This participation has as its objectives:

- ensuring UTRUST's compliance with all applicable laws, statutory instruments of regulation, and requirements of any of UTRUST's supervisory bodies;
- protecting UTRUST and all its staff as individuals from the risks associated with breaches of the law, regulations and supervisory requirements;
- preserving UTRUST's good name against the risk of reputational damage presented by implication of involvement with money laundering and terrorist financing activities;
- making a positive contribution to the fight against crime and terrorism.

To achieve these objectives, it is UTRUST's policy that:

- every member of staff shall meet their personal obligations in accordance with their role, responsibilities and position in UTRUST;
- commercial considerations shall never be permitted to take precedence over UTRUST's anti-money laundering commitment;
- UTRUST's Money Laundering Reporting Officer (MLRO) and nominated persons acting under the instructions of the MLRO shall be given every assistance and cooperation by
- all members of staff in carrying out the duties of the appointment.

This AML Policy also includes:

- Establishment of a system based approach to Risk Based Approach (RBA) towards assessing and managing the money laundering and terrorist financing risks to the company;
- Establishment of a risk-based customer due diligence, identification, verification and know your customer (KYC) procedures, including but not limited to customers presenting higher risk, such as Politically Exposed Persons (PEPs);
- Establishment of procedures to monitor on-going customer activity;

SANCTIONS POLICY:

UTRUST signups will be screened against the major sanctions lists such as: United Nations, European Union, Switzerland SECO, UK Treasury and US Office of Foreign Assets Control (OFAC). As such UTRUST is forbidden from transacting with individuals that are flag on those lists.

REFERENCES:

[European Union AML Guidelines](#)

[Switzerland/FINMA AML Guidelines](#)