



MONEY LAUNDERING PREVENTION
Fortis Market Ltd.

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1. Introduction

Fortis Market is incorporated in North Macedonia, having its Registered address at 3/2-22 blvd. 8th September Skopje, Karposh, Karposh with tax number 4057024572540. Fortis Market LTD is licensed by the Anjouan Offshore Finance Authority. License number: L15926/FM.

Fortis Market is fully committed to maintaining a secure and transparent financial environment by adhering to the highest standards of Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) regulations. We have implemented comprehensive policies and procedures to ensure compliance with all applicable legal frameworks and international best practices.

This document outlines the internal measures, procedures, and controls established by Fortis Market to prevent financial crime and illicit activities. Our policies are designed to:

- Identify and assess potential risks related to money laundering and terrorist financing (ML/TF) that may arise from the provision of financial services.
- Effectively mitigate and manage such risks in full compliance with the applicable legal and regulatory framework.

2. Legal and Regulatory Compliance

Fortis Market strictly adheres to both national and international AML/CFT regulations. The term "Applicable Legislation" within this document refers to:

- The Prevention and Suppression of Money Laundering and Terrorist Financing Law 188(I)/2007, as amended.
- Directive DI144-2007-08 on AML/CFT measures, issued by the relevant regulatory commission.
- Directive (EU) 2018/843 (AMLD V), amending Directive (EU) 2015/849 (AMLD IV) of the European Parliament and the Council, aimed at strengthening the financial system against money laundering and terrorist financing.
- Financial Action Task Force (FATF) Recommendations, which set global standards for AML/CFT compliance.
- ESAs Joint Guidelines under Articles 17 and 18(4) of Directive (EU) 2015/849, providing a risk-based approach to AML/CFT obligations.
- Other relevant directives, circulars, and regulatory guidelines issued by financial authorities.

Fortis Market continuously reviews and updates its AML/CFT policies to align with evolving regulatory requirements and international best practices.

4. Compliance with the AML/CFT Legislation

Fortis Market has established and implemented a comprehensive Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) Compliance Program, designed to ensure adherence to applicable laws, regulations, and international best practices. This program employs a risk-based approach to effectively identify, assess, and mitigate money laundering and terrorist financing risks.

Our AML/CFT Compliance Program incorporates the following key components:

i. Risk-Based Approach

A company-wide Risk Management Framework is in place to systematically assess and manage AML/CFT risks. This framework includes:

- Conducting AML/CFT Risk Assessments to identify and mitigate both inherent and residual risks.
- Implementing Customer Due Diligence (CDD) procedures, incorporating Know Your Customer (KYC) policies to verify client identities, including their ultimate beneficial owners (UBOs) where applicable.
- Applying Enhanced Due Diligence (EDD) measures for high-risk clients, such as Politically Exposed Persons (PEPs), their close relatives, and associates.
- Requiring senior management approval for onboarding high-risk clients, particularly those categorized as PEPs.

ii. Customer Onboarding Policy

Fortis Market has established a structured onboarding process to ensure full compliance with the applicable legal and regulatory framework. The policy outlines the due diligence measures applied when onboarding new clients, ensuring that all necessary verifications are completed before establishing a business relationship.

iii. Customer Screening

Fortis Market enforces strict screening policies to ensure compliance with international sanctions and restrictive measures (e.g., EU, UN, OFAC sanctions). The company does not engage in any transactions involving sanctioned individuals, entities, or organizations. Ongoing screening is conducted against a global database of sanctions lists, Adverse Media Reports, Enforcement Data, and Politically Exposed Persons (PEPs).

iv. Record Retention Policy

All customer and transaction records are securely maintained for at least five (5) years from the date of transaction execution or business relationship termination. This ensures compliance with regulatory requirements and facilitates audit and investigative processes if needed.

v. Suspicious Activity and Transaction Reporting

Fortis Market has a dedicated mechanism for detecting, documenting, and reporting suspicious activities. In cases where a transaction appears irregular or raises red flags, we prepare and submit:

- Suspicious Activity Reports (SARs)
- Suspicious Transaction Reports (STRs)

These reports are filed with the relevant regulatory authorities as required by law.

vi. Ongoing Monitoring of Transactions and Customer Activity

Our systems are designed to continuously monitor customer account activity and transactions. This real-time surveillance helps detect unusual patterns, potential financial crimes, and any transactions that may raise suspicion.

vii. Independent Compliance Audits

To uphold the integrity of our AML/CFT policies, Fortis Market undergoes independent audits on an annual basis. These assessments evaluate the effectiveness, adequacy, and compliance of our AML/CFT procedures, ensuring that any identified weaknesses are addressed promptly.

viii. Employee Training and Awareness

Regular and role-specific AML/CFT training programs are conducted to educate employees on evolving financial crime risks. These training sessions ensure that staff members remain fully informed about their responsibilities in detecting and preventing money laundering and terrorist financing activities.

5. AML Compliance Vigilance

At Fortis Market, we are unwavering in our commitment to preventing the misuse of our products and services for illicit financial activities. We take a proactive approach to combating money laundering and terrorist financing by implementing robust systems for prevention, detection, and reporting of unusual or suspicious activities.

To maintain the highest standards of AML/CFT compliance, we continuously evaluate and enhance our existing policies, procedures, and technologies, adapting them as necessary to address emerging risks and evolving regulatory landscapes. This ongoing assessment ensures that our AML controls remain effective in mitigating financial crime threats.

Recognizing that financial crimes are ever-evolving, Fortis Market has developed a comprehensive employee training program to equip staff with the knowledge and tools necessary to identify and counteract fraudulent activities. This program educates employees on the latest money laundering techniques, ensuring that our team remains vigilant against sophisticated criminal schemes.

We acknowledge that preventing money laundering and identifying terrorist financing risks require continuous effort and adaptability. At Fortis Market, we remain dedicated to identifying potential risks, implementing strong compliance frameworks, and fostering a culture of vigilance to safeguard the integrity of our financial operations.

6. Client Responsibilities and Obligations

Clients utilizing Fortis Market's services have a duty to:

- Provide accurate and up-to-date personal and financial information.
- Comply with all applicable AML/CFT laws.
- Avoid engaging in suspicious or fraudulent transactions.
- Report any unusual or suspicious activity encountered in their account.

Failure to adhere to these responsibilities may result in account restrictions, termination, or legal action.

7. Enforcement and Consequences of Non-Compliance

To uphold regulatory standards, Fortis Market enforces strict compliance with AML/CFT regulations. Any individual or entity found to be engaging in fraudulent, illegal, or non-compliant activities will be subject to immediate action, including:

- Account suspension or termination.
- Reporting to relevant financial and law enforcement authorities.
- Legal proceedings, where applicable.
- Fortis Market reserves the right to take necessary measures to prevent misuse of its financial services.

8. Disclaimers

The Money Laundering Prevention Policy serves as an internal guideline and does not form part of our Terms and Conditions of Business. It is not intended to be legally binding nor does it impose any additional obligations on Fortis Market beyond those required by applicable laws and regulations.

Fortis Market reserves the right to decline or halt the processing of any fund transfer at any stage if there is reasonable suspicion of its connection to illicit activities, including but not limited to money laundering or financial crimes.

Additionally, the Company retains the sole discretion to review, modify, or update this Money Laundering Prevention Policy as necessary to reflect changes in legal requirements, regulatory frameworks, or operational needs.

9.Contact Details

For any inquiries or concerns regarding our Money Laundering Prevention Policy, please contact our Compliance Department at:

Email: info@fortismarket.com