



CTS Cloud Trading Solutions Ltd

AML / KYC Statement
September 2023



1. AML / KYC Statement

CTS Cloud Trading Solutions Ltd, previously registered as Novox Capital Ltd, (the "**Company**") is a Cyprus Investment Firm authorised and regulated by the Cyprus Securities & Exchange Commission (the "**CySEC**"), under License No.: 224/14. The Company is not subject to consolidated supervision and does not belong to any group of companies.

The Company is subject to the requirements of Cyprus and EU statutory laws and regulations regarding Anti-Money Laundering (the "AML") and Counter Terrorist Financing (the "CTF"), such as the EU 5th AML Directive, inter alia, the Cyprus AML Law of 2007-2021 L.188(I)/2017 and CySEC's AML Directive, issued on the 27th of March 2020, (collectively referred to as the "**Applicable AML Laws**").

The Company also implements a **Sanctions Compliance Programme** relating to applicable sanctions administered by the EU Council Sanctions (the "EU Sanctions"), the UN Security Council Sanctions (the "UN Sanctions") and the U.S. Department of the Treasury, Office of Foreign Assets Control (the "OFAC Sanctions").

As required by the Applicable Laws, the Company developed an internal AML Manual by implementing a risk-based approach (the "RBA"), that complies with the specific provisions. Accordingly, the Company's AML/CTF Manual includes, but is not limited to:

- appointment of Compliance/AMLCO officer (full-time/permanent basis);
- appropriate Client Due Diligence Program (the "CDD"), along with the Client Acceptance Policy (the "CAP") and appropriate CDD on clients depending on their risk profile and categorisation;
- enhanced due diligence on high-risk customers (the "EDD"), such as PEPs;
- annual independent testing from the Internal Auditor;
- AML training programme;
- policies and procedures for transaction monitoring (for potentially suspicious activities);
- reporting of suspicious activities to the Competent Authorities (CySEC/MOKAS);
- policies of forbidding the provision of services to specific clients; and
- policies and controls to ensure compliance with the sanctions (as listed above).

Relevant AML/CTF documentation and trading records are maintained for a period of at least five (5) years after account closing.

The Company is in full compliance with the Applicable Laws and is committed to minimizing the risks posed by non-compliance with the AML/CTF regulatory framework.

For any further information and/or clarifications, please contact the Compliance Department via email at compliance@could-trading.eu