AML and Jurisdictional Restrictions

Company Name (DBA):

ASAP Solutions FZ-LLC / SureLeverage

1. Purpose

This policy outlines the Anti-Money Laundering (AML) and jurisdictional restrictions applicable to the

onboarding and ongoing monitoring of traders associated with ASAP Solutions FZ-LLC /

SureLeverage. The objective is to ensure compliance with international AML regulations and to

mitigate risks associated with transactions from prohibited jurisdictions.

2. Scope

This policy applies to all traders seeking to engage with ASAP Solutions FZ-LLC / SureLeverage. It

covers the onboarding process, ongoing monitoring, and identifies jurisdictions where trading

activities are prohibited.

3. AML Compliance

ASAP Solutions FZ-LLC / SureLeverage are committed to preventing money laundering and terrorist

financing. The following measures are implemented:

• Customer Due Diligence (CDD): All traders must undergo a thorough verification process,

including the collection of identification documents (e.g., passport, government-issued ID) and

proof of address (e.g., utility bill, bank statement).

• Know Your Customer (KYC): Enhanced KYC procedures are applied to traders based on

risk assessments. This includes ongoing monitoring of transactions to detect suspicious

activities.

• Suspicious Activity Reporting (SAR): Any suspicious activity detected during the

onboarding process or through ongoing monitoring will be reported to the appropriate authorities as required by law.

• Record Keeping: All documents and transaction records must be retained for a minimum of five (5) years after the end of the business relationship.

4. Prohibited Jurisdictions

Traders residing in or conducting transactions from the following jurisdictions are prohibited from onboarding or participating in any trading activities with ASAP Solutions FZ-LLC / SureLeverage.

This list is subject to change based on updates to international sanctions and AML regulations:

• Countries and Territories Subject to Comprehensive Sanctions:

• North Korea

• Iran

• Syria

• Sudan

• Crimea Region of Ukraine

• Cuba

• Countries Identified as High-Risk and Non-Cooperative Jurisdictions by FATF:

• Afghanistan

• Myanmar (Burma)

• Yemen

• Iraq

• South Sudan

• Venezuela

• Other Restricted Countries:• Somalia

• Libya

• Democratic Republic of the Congo

• Zimbabwe

• Russia

• Belarus

Traders from these jurisdictions are automatically disqualified from engaging with ASAP Solutions

FZ-LLC / SureLeverage. If a trader attempts to onboard or participate from a prohibited jurisdiction,

their account will be immediately suspended, and appropriate actions will be taken in accordance

with applicable laws.

5. Ongoing Monitoring and Review

• Transaction Monitoring: All trading activities are subject to ongoing monitoring to detect

any red flags or indicators of AML risks. Unusual or suspicious transactions will be reviewed,

and appropriate action will be taken.

• Jurisdictional Updates: The list of prohibited jurisdictions will be regularly reviewed and

updated in accordance with international sanctions, regulatory changes, and risk assessments.

Traders will be notified of any changes that may affect their ability to trade.

• Compliance Reviews: Periodic reviews of the AML policies and procedures will be

conducted to ensure compliance with all applicable laws and regulations.

6. Enforcement and Penalties

Failure to comply with this policy may result in the immediate termination of the trader’s account,

forfeiture of funds, and reporting to the relevant authorities. Additionally, any violations may result in

legal actions against the individual or entity involved.

7. Contact Information

For questions or concerns related to this policy, please contact our compliance department at:

• Email: support@sureleveragefunding.com