



# **INFORMATION IN RELATION TO ANTI-MONEY LAUNDERING AND TO COUNTER-TERRORISM FINANCING**



Profit Pulse Ltd, (hereinafter referred to as the “Company”), is a company incorporated and registered in Mwali (Moheli) KM, of Comoros Union, with registration no. HT00324036, and its registered address at P.B. 1257 Bonovo Road, Fomboni, Comoros, KM. The Company is authorized and regulated by Mwali International Services Authority (MISA), holding a Brokerage License with no. BFX2024063. The Company’s website is [www.skadeva.com](http://www.skadeva.com).

The Company does its utmost to ensure the privacy, confidentiality and security of its clients are preserved both throughout their interaction with the company and afterwards, to the fullest extent achievable by the Company. At the same time, the Company is obliged to follow certain requirements as set out by the local regulator for preventing and suppressing money laundering activities. As of such, the Company is obliged to follow strict Anti-Money Laundering (“AML”) and Counter Terrorism Financing procedures while it is also required to obtain certain verification information as well as documentation.

As part of the Company’s AML & CFT Policy, the Company has implemented a comprehensive Know Your Customer (“KYC”) and/or Customer Due Diligence (“CDD”) policy. This includes continuous monitoring and analysis of customer profiles and their trading account transactions. This Know Your Customer (“KYC”) and/or Customer Due Diligence (CDD) measures, outline the procedures and measures adopted by the Company to identify, verify, and monitor customers and beneficial owners in compliance with applicable Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations. The Company shall apply the following CDD measures at the time of establishing a business relationship or conducting an occasional transaction:

- Identification and Verification of the Customer:
  - Obtain and verify the customer’s identity using reliable and independent sources.
  - Acceptable identification documents include: a valid government-issued photo ID (e.g. passport, national ID card, driver’s license), proof of residential address (e.g. utility bill, bank statement issued within the last 3 months)
- Third Party Identification:
  - Determine whether the customer is acting on behalf of a third party.
  - If so, identify and verify the third party’s identity using the same standards as for the customer.
- Identification and Verification of Beneficial Owners in regards to legal entities (when applicable):
  - Identify the beneficial owner(s) of the customer and/or any third party (if applicable);
  - Take reasonable, risk-sensitive measures to verify the identity of each beneficial owner and/or director and/or authorized representative;
  - Receive all corporate documents in regards to legal name, legal form, head office address.
  - Receive information on the ownership structure, the control structure, and/or the natural persons who ultimately own or control the entity.
- Establish Purpose and Nature of Business Relationship and assess information regarding same i.e.:
  - The purpose of the account or service
  - The intended nature and expected activity of the relationship
  - The source of funds (where necessary)
- Perform Ongoing Monitoring as per below:
  - Monitor transactions to ensure consistency with the customer’s known profile
  - Detect and report any unusual or suspicious activity



- Ensure that all documents, data, and information remain accurate and up to date.
  - Reassess customer risk levels periodically or when significant changes occur.
- For higher-risk customers or situations (e.g., politically exposed persons (PEPs), high-risk jurisdictions, complex structures), the Company shall be performing Enhanced Due Diligence measures (“EDD”) which may include:
    - Obtaining additional identification documents;
    - Verifying the source of funds and wealth;
    - Increasing the frequency of transaction monitoring;
    - Requiring senior management approval to establish or continue the relationship.
  - For PEP clients, the Company shall take the following measures:
    - Adequately identify and verify his identity as set out in this section;
    - Obtain the approval of senior management before establishing a business relationship with the politically exposed person;
    - Take reasonable measures to establish the source of funds and source of property; and
    - Conduct regular enhanced monitoring of the business relationship.

The Company has implemented policies and procedures to ensure full compliance with applicable international sanctions, including those imposed by the EU, UN, and the OFAC. The Company strictly prohibits engaging in any activity with, or on behalf of, individuals, entities, or organizations subject to sanctions or enforcement measures. To support this, the Company conducts ongoing customer screening against a comprehensive global database of sanctions lists, PEPs and adverse media sources. The Company is vigilant in ensuring the prevention of its involvement or misuse in money laundering activities and is not knowingly accepting assets or entering business relationships where there is reasonable cause to believe that such assets may have been acquired illegally or may represent the proceeds of criminal activity.

The Company shall promptly report suspicious transactions relating to any account to the Supervisory Authority. Where there is suspicion that the source of funds may be criminal or that a client may be involved in criminal activity, the Company shall follow established procedures for assessing the evidence and determine what course of action should be pursued.

The Company shall keep records of reports made by their staff and of reports made to the Supervisory Authority, as per regulatory provisions. All CDD records, including identification documents, verification methods, and transaction history, shall be kept for at least five (5) years after the end of the business relationship or completion of an occasional transaction.

The Company maintains the right to request any additional documentation that might be deemed necessary at any point in the business relationship.

Customer information shall be reviewed and updated periodically, especially for long-term relationships or when risk factors change.

Should you require any further information and/or have any questions about this document please contact us at [support@skadeva.com](mailto:support@skadeva.com).