

# AML & KYC Policy

Abse Markets

## Abse Markets

Licensed by the Financial Services Commission (FSC) of Mauritius

Global Business Licence No. GB25205423

Code FS-4.1 | Code SEC-2.1B — Investment Dealer (Full Service Dealer, Excluding Underwriting)

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## 1. Introduction and Legal Framework

1.1 This Anti-Money Laundering and Know Your Customer Policy ("Policy") is issued by Absel Markets in fulfilment of its obligations as a licensed Investment Dealer regulated by the Financial Services Commission (FSC) of Mauritius under Licence No. GB25205423.

1.2 Absel Markets is committed to the highest standards of AML and Counter-Financing of Terrorism (CFT) compliance. This Policy governs the procedures and controls established to prevent, detect, and report money laundering, terrorist financing, and other financial crime.

1.3 This Policy has been developed in accordance with:

- The Financial Intelligence and Anti-Money Laundering Act 2002 (FIAMLA) and its 2018 Regulations
- The Financial Services Act 2007
- The Prevention of Terrorism Act 2002
- FSC Guidance Notes on AML/CFT for Investment Dealers
- Financial Action Task Force (FATF) Recommendations

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## 2. Scope and Application

2.1 This Policy applies to all employees, officers, and directors of Absel Markets, as well as to all clients, agents, introducers, and counterparties with whom the Company transacts business.

2.2 Absel Markets has appointed a designated Money Laundering Reporting Officer (MLRO), responsible for implementing and overseeing this Policy and filing Suspicious Transaction Reports (STRs) with the Financial Intelligence Unit (FIU) of Mauritius where required.

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## 3. Customer Due Diligence (CDD)

3.1 Absel Markets applies Customer Due Diligence procedures to all clients at account opening and on an ongoing basis.

3.2 Standard CDD documentation requirements:

Client Type	Required Documentation
Individual	Valid government-issued photo ID; proof of current residential address (within 3 months); source of funds declaration.
Corporate Entity	Certificate of incorporation; memorandum and articles; register of directors and shareholders; beneficial ownership declaration (UBOs 10%+); authorised signatory confirmation.
Politically Exposed Person	All standard CDD documents plus enhanced due diligence measures as described in Section 4.

3.3 CDD must be completed before the client is permitted to fund their account or place any trades. Absel Markets reserves the right to decline any application where satisfactory CDD cannot be completed.

## 4. Enhanced Due Diligence (EDD)

4.1 Enhanced Due Diligence is applied to higher-risk clients, including Politically Exposed Persons, clients from high-risk jurisdictions, those in higher-risk business sectors, clients depositing unusually large sums, and clients whose source of funds cannot be easily verified.

4.2 EDD measures may include additional source of funds evidence, senior management approval, more frequent monitoring, and enhanced transaction scrutiny.

## 5. Simplified Due Diligence (SDD)

5.1 In limited circumstances where the risk of money laundering is demonstrably low, Absel Markets may apply Simplified Due Diligence. SDD does not exempt Absel Markets from ongoing monitoring or from filing STRs where there is reasonable suspicion of financial crime.

## 6. Ongoing Monitoring

6.1 Absel Markets monitors all client accounts and transactions on an ongoing basis through automated transaction surveillance, manual review of flagged accounts, periodic KYC reviews, and screening against sanctions lists, PEP databases, and adverse media.

6.2 Client risk ratings are reviewed at least annually and whenever a triggering event occurs.

## 7. Suspicious Activity Reporting

7.1 Any employee who suspects a client or transaction is connected to money laundering or terrorist financing must immediately submit an internal Suspicious Activity Report (SAR) to the MLRO, who will assess and file an STR with the FIU where required under Section 14 of FIAMLA 2002.

7.2 Absel Markets maintains a strict policy of non-tipping off. No client or third party should be informed that a SAR or STR has been filed. Breach of this obligation is a criminal offence.

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## 8. Record Keeping

8.1 Absel Markets retains all KYC documentation, transaction records, SARs, and STRs for a minimum of seven years from the date of the transaction or end of the client relationship, in accordance with FIAMLA 2002 and FSC requirements.

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## 9. Training and Awareness

9.1 Absel Markets provides mandatory AML/CFT training to all relevant staff upon joining and at least annually thereafter, covering the legal framework, red flags, CDD procedures, the SAR process, and the consequences of non-compliance.

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## 10. Sanctions Screening

10.1 Absel Markets screens all clients against applicable sanctions lists at onboarding and on an ongoing basis, including UN, OFAC, EU, and HM Treasury lists. Where a client matches a sanctioned entity, Absel Markets will immediately freeze the account and notify relevant authorities.

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## 11. Non-Face-to-Face Clients

11.1 As Absel Markets operates exclusively online, all client relationships are non-face-to-face. This risk is mitigated through digital identity verification, liveness and biometric checks where available, IP and device fingerprinting, and email and telephone verification at account opening.

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## 12. Policy Review

12.1 This Policy is reviewed by the Absel Markets Compliance Department and MLRO at least annually. Questions should be directed to [compliance@abselmarkets.com](mailto:compliance@abselmarkets.com).

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