



ANTI-MONEY LAUNDERING (AML)

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QRS Global - Anti-Money Laundering (AML) Policy

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A. POLICY PURPOSE & GLOBAL COMPLIANCE FRAMEWORK

QRS Global LLC (“the Company”) is fully committed to preventing and detecting money laundering, terrorist financing, and any activity that facilitates financial crime, in accordance with:

- FATF (Financial Action Task Force) Recommendations
- International AML / CTF Standards
- Mwali International Services Authority requirements
- Financial Commission (FinCom) best practices
- Global brokerage industry AML frameworks

This Policy consolidates and enhances the principles outlined in QRS Global’s existing AML documents and international benchmark policies

B. DEFINITION OF MONEY LAUNDERING & TERRORIST FINANCING

1.1 Money Laundering

Money laundering is any act intended to conceal, disguise, convert, transfer, or legitimize proceeds derived from criminal activities so that such proceeds appear to originate from legitimate sources.

The laundering process typically involves:

1. Placement – Introducing illegal funds into the financial system
2. Layering – Conducting multiple transactions to obscure the origin
3. Integration – Reintroducing funds as “legitimate” assets

1.2 Terrorist Financing (CTF)

Terrorist financing includes the provision, collection, or movement of funds—whether legally or illegally obtained—with the intention that such funds be used to support terrorist acts or organizations.

C. RISK-BASED APPROACH (RBA)

QRS Global applies a Risk-Based Approach to AML/CTF, assessing risk across:

- Customer Risk (individual, corporate, nominee, PEP)
- Geographic Risk (high-risk or sanctioned jurisdictions)
- Product Risk (leverage trading, crypto exposure, fast withdrawal products)
- Transaction Risk (frequency, size, pattern inconsistency)

Higher risk = enhanced due diligence (EDD).

D. CUSTOMER IDENTIFICATION & KYC (CIP / KYC)

QRS Global enforces a strict Customer Identification Program (CIP):

Required:

- Full legal name
- Date of birth
- Nationality

- Residential address
- Government-issued photo ID
- Proof of address
- Source of Funds (SOF) declaration

No anonymous or fictitious accounts are permitted Anti Money Laundering Statement Verification is mandatory before any withdrawal and may be re-requested at any time.

E. SOURCE OF FUNDS & SOURCE OF WEALTH CONTROL

Clients must demonstrate that deposited funds originate from legitimate sources, such as:

- Employment income
- Business revenue
- Investments
- Savings

QRS Global reserves the right to request:

- Bank statements
- Payslips
- Business records
- Crypto transaction history (TXID, wallet ownership proof)

F. DEPOSIT & WITHDRAWAL CHANNEL CONSISTENCY RULE

(Critical AML Control – Enhanced)

QRS Global strictly enforces channel consistency rules to prevent laundering and layering.

1.1 Core Principle

Funds must be withdrawn via the same channel and in the same name as the original deposit.

1.2 Explicit Prohibitions (Examples)

- Deposit via THB bank transfer → Withdraw via USDT / Crypto
- Deposit via Crypto wallet A → Withdraw to wallet B
- Deposit from third-party account → Withdraw to client's own account
- Deposit fiat → Withdraw to unrelated digital assets

These patterns represent classic layering techniques and are not permitted.

G. CRYPTO & DIGITAL ASSET AML CONTROLS

Where crypto deposits or withdrawals are permitted:

- Wallet ownership verification is mandatory
- Blockchain transaction tracing may be conducted
- High-risk chains, mixers, tumblers, privacy tools may be restricted

- Conversion between fiat ↔ crypto must follow strict consistency rules

QRS Global may reject, freeze, or reverse crypto-related transactions deemed high-risk.

H. SUSPICIOUS ACTIVITY & RED FLAGS

Indicators include but are not limited to:

- Repetitive deposit → trade → withdraw cycles with no market exposure
- Large deposits inconsistent with client profile
- Immediate withdrawals after minimal trading
- Multiple accounts sharing IP, device, or patterns
- Attempts to bypass verification or policy
- Structuring transactions to avoid thresholds
- Using trading as a “pass-through” rather than investment

These indicators align with suspicious scenarios described in QRS Global AML documentation AML

I. EXAMPLES OF MONEY LAUNDERING CASES (PRACTICAL)

Case 1: Fiat-to-Crypto Conversion

Client deposits THB → requests withdrawal in USDT → Rejected (Layering & value conversion risk)

Case 2: Rapid Cycling

Deposit → open minimal trades → withdraw full balance repeatedly → High-risk placement & integration

Case 3: Multiple Wallet Routing

Crypto deposit from Wallet A → withdrawal to Wallet C → Obfuscation of ownership

Case 4: Third-Party Funding

Funds deposited by unrelated individual → Potential nominee laundering

Case 5: Account Farming

Multiple accounts, same IP/device, coordinated trading → Organized laundering / fraud network

J. MONITORING, INVESTIGATION & REPORTING

QRS Global conducts:

- Continuous transaction monitoring
- Behavioral pattern analysis
- Manual compliance review
- Internal AML investigations

Where suspicion remains unresolved:

- Account may be restricted or frozen
- SAR may be filed with relevant authorities

- Cooperation with regulators and FinCom is mandatory

K. FREEZING, SEIZURE & ENFORCEMENT

QRS Global reserves the right to:

- Freeze accounts
- Withhold withdrawals
- Reverse transactions
- Terminate relationships

Where funds are reasonably suspected to originate from criminal activity or policy violations, as stated in QRS AML enforcement provisions AML

L. DATA RETENTION & CONFIDENTIALITY

All AML records are retained according to regulatory requirements and handled in strict confidence.

Tipping-off is strictly prohibited.

M. STAFF TRAINING & GOVERNANCE

- Dedicated AML Compliance Officer (AMLCO)
- Continuous staff training
- Annual policy review
- Internal audit & regulatory cooperation

N. FINAL STATEMENT

QRS Global maintains a zero-tolerance stance toward money laundering, terrorist financing, and financial crime.

Compliance with this Policy is mandatory for all clients, partners, and employees.

O. POLITICALLY EXPOSED PERSONS (PEPs) & SANCTIONS SCREENING

1.1 Definition of PEPs

Politically Exposed Persons (PEPs) refer to individuals who are or have been entrusted with prominent public functions, including but not limited to:

- Heads of state or government
- Senior politicians
- Senior government, judicial, or military officials
- Executives of state-owned enterprises
- Immediate family members and close associates of the above

1.2 PEP Risk Management

QRS Global applies Enhanced Due Diligence (EDD) to all PEPs, including:

- Mandatory senior management approval
- Enhanced Source of Funds / Wealth verification

- Ongoing transaction monitoring
- Periodic risk reassessment

QRS Global reserves the right to decline, restrict, or terminate relationships with PEPs where AML risk is deemed excessive.

P. SANCTIONS, WATCHLIST & RESTRICTED JURISDICTIONS

1.1 Sanctions Screening

QRS Global conducts screening against:

- International sanctions lists
- Law enforcement and regulatory watchlists
- Internal risk databases

1.2 Restricted Jurisdictions

Clients connected to jurisdictions classified as:

- High-risk
- Non-cooperative
- Sanctioned
- may be subject to:
 - Enhanced due diligence
 - Transaction limitations
 - Account rejection or closure



Q. STRUCTURING, SMURFING & EVASION BEHAVIOURS

QRS Global strictly prohibits any attempt to:

- Split transactions to avoid monitoring
- Conduct multiple small deposits/withdrawals to bypass controls
- Circumvent AML thresholds or verification requirements

Such actions will be treated as intentional AML evasion and may result in immediate enforcement actions.

R. THIRD-PARTY, NOMINEE & BENEFICIAL OWNERSHIP CONTROLS

1.1 Third-Party Transactions

QRS Global does not permit:

- Deposits from unrelated third parties
- Withdrawals to accounts not held in the client's name

1.2 Beneficial Ownership

For corporate or structured accounts, QRS Global requires:

- Identification of Ultimate Beneficial Owners (UBOs)
- Ownership and control structure disclosure

- Verification of controlling persons

Failure to disclose true beneficial ownership constitutes a material breach of AML policy.

S. ABUSE OF TRADING PLATFORM AS A MONEY-TRANSFER MECHANISM

QRS Global prohibits the use of its trading platform for:

- Value transfer without genuine market exposure
- Acting as a payment intermediary
- Pass-through transactions
- Artificial trading designed solely to legitimize funds

Trading activity lacking economic or investment rationale may be classified as suspicious financial behavior.

