



# SANDERSON

## Anti-Money Laundering Policy

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### 1. Purpose and Scope

**Purpose:**

The purpose of this AML policy is to establish protocols and procedures to prevent money laundering and terrorist financing in compliance with Canadian and Ontario laws. This policy outlines how Sanderson acquires and manages clients, ensuring that all client interactions and transactions adhere to AML requirements, and aims to protect Sanderson from being used as a vehicle for illegal activities.

**Scope:**

This policy applies to all operations involving Sanderson's interactions with clients, including those acquired through TradingView, and covers client identification, transaction monitoring, and reporting of suspicious activities in compliance with applicable laws.

## **2. Roles and Responsibilities**

Sanderson's Role:

- Sanderson is responsible for managing client relationships, conducting KYC, monitoring transactions, and reporting any suspicious activities to ensure compliance with AML regulations.
- A designated Compliance Officer will oversee AML compliance and ensure that all procedures are followed according to regulatory requirements.

Compliance Officer:

- The Compliance Officer will oversee the implementation of the AML policy, conduct regular audits, and ensure that all staff members are trained on AML requirements.
- The Compliance Officer will handle issues or complaints arising from client interactions, ensuring timely and effective resolution.

## **3. Client Acquisition through TradingView**

Platform Overview:

- Sanderson acquires clients exclusively through TradingView, a global platform where traders and investors share ideas and insights. TradingView is independently owned, requiring users to pay a subscription fee for access, which adds a layer of legitimacy and security to its user base.

Group and Client Engagement:

- Sanderson manages a group called Trade24Fx on TradingView, with over 16,000 followers. Over the past six years, this group has grown organically through consistent posting of trading insights and educational content.
- Clients only come from TradingView; Sanderson does not acquire clients from any other sources. Even when referred by others, clients must still engage through TradingView as a strict requirement to ensure they are genuine users of the official platform.

Client Demographics and Trust:

- Most clients are over 40 years old, a demographic more prone to online scams. These clients typically have had negative experiences with other providers and seek a trusted source for purchasing USDT.
- Sanderson's strict policy of acquiring clients only through TradingView ensures a high level of trust and security, as the platform has robust mechanisms to prevent scammers. To date, Sanderson has never encountered scammers on TradingView.

Screening and Verification:

- To further ensure client safety, Sanderson conducts preliminary communications and video calls with potential clients. These steps confirm their identity and ensure they are not being influenced by external parties, particularly considering the vulnerability of older adults.
- Identity documents are requested and verified through video calls, confirming that clients are genuine and fully aware of the transaction process.

#### **4. Know Your Customer (KYC) Procedures**

KYC Process:

- Sanderson performs thorough KYC procedures for all new clients, including verifying identity through government-issued IDs, proof of address, and conducting video calls for additional verification.
- Clients are screened against international sanctions lists and PEP databases to ensure compliance.
- Enhanced due diligence is conducted for clients deemed high-risk based on their background or transaction history.

#### **5. Fraud and Money Laundering Prevention Measures**

Comprehensive Information Gathering:

- Sanderson is committed to preventing fraud and money laundering by gathering as much information as possible from clients during the onboarding process. This includes collecting detailed personal information, such as government-issued identification, proof of address, and other relevant documents.

Video Call Verification:

- One of the key measures Sanderson employs to verify client identity and assess legitimacy is through video calls. During these calls, Sanderson confirms the client's identity, checks the authenticity of provided documents, and ensures that the client is fully aware of the transaction process.
- Video calls serve as an additional layer of security, especially for older clients who may be more vulnerable to scams or undue influence. Sanderson uses these calls to ensure that clients are not being coerced or misled into purchasing USDT.

Ensuring Client Understanding and Consent:

- Through these video interactions, Sanderson verifies that clients understand the nature of their transactions and are making informed decisions. This process helps to identify and mitigate potential red flags that could indicate fraud or money laundering.

## Building Trust and Reducing Risk:

- Sanderson's approach of direct engagement through video calls builds trust with clients and provides an opportunity to address any concerns they may have about the safety of their transactions. By thoroughly verifying clients and their intentions, Sanderson effectively reduces the risk of facilitating fraudulent or illegal activities.

## Record Keeping of Verification Processes:

- All verification processes, including video calls and collected documents, are securely recorded and stored in compliance with regulatory requirements. This documentation not only supports Sanderson's commitment to AML compliance but also provides a clear audit trail in the event of any regulatory reviews or client disputes.

## **6. Risk Assessment**

### Risk Assessment Procedures:

- Sanderson assesses the risk level of each client based on factors such as geographic location, previous transaction history, and the source of funds.
- High-risk clients undergo more stringent checks and continuous monitoring to ensure compliance and mitigate potential risks.

## **7. Transaction Monitoring**

### Monitoring and Analysis:

- Sanderson uses automated systems to monitor client transactions for unusual activity, such as large or atypical transactions that may indicate potential money laundering.
- Alerts are generated for transactions that exceed established thresholds, prompting further review by the Compliance Officer.

## **8. Reporting of Suspicious Transactions (STR)**

### STR Submission Process:

- Any suspicious transactions identified by Sanderson are reported to FINTRAC in accordance with legal requirements.
- The Compliance Officer manages the submission of STRs, ensuring they are filed accurately and promptly.

## **9. Sanctions and PEP Screening**

### Screening Procedures:

- Sanderson screens all clients against relevant sanctions lists and PEP databases to ensure compliance.
- Any matches are escalated to the Compliance Officer for review, with services potentially restricted or terminated as necessary.

## **10. Record Keeping**

Documentation Requirements:

- Sanderson maintains comprehensive records of all KYC documentation, client communications, transaction data, and compliance activities.
- Records are securely stored for a minimum of five years in compliance with Canadian regulations.

## **11. Training and Compliance Support**

Employee Training:

- Sanderson provides regular training sessions for all employees on AML policies, KYC procedures, and data protection.
- Training is updated annually or as needed to reflect changes in laws and industry standards.

## **12. Internal Audits and Policy Review**

Audit Procedures:

- Sanderson conducts regular internal audits to evaluate the effectiveness of its AML measures and identify areas for improvement.
- The AML policy is reviewed annually and updated to align with regulatory changes and business needs.

## **13. Complaint Management and Client Communication**

Handling Client Complaints:

- Sanderson acknowledges that despite thorough compliance efforts, complaints from clients may still arise.
- In the event of a complaint, Sanderson will address the issue promptly and transparently, including processing refunds if necessary.
- All complaints and resolutions will be documented to ensure accountability and compliance.