AML/CFT Policy

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Anti-money laundering and counter-terrorist financing policy.

WHITECAPITAL applies a risk-based approach to preventing the use of its services for money laundering, terrorist financing, fraud, sanctions evasion and illegal operations.

Purpose of the policy

The purpose of the policy is to prevent the use of WHITECAPITAL services for:
money laundering;
terrorist financing;
fraud;
sanctions evasion;
illegal goods and services;
anonymous transfers;
operations without economic purpose.

Scope

The policy applies to:
merchants;
clients of the agency model;
directors;
representatives;
beneficial owners;
suppliers;
payment resources;
operations;
client instructions;
refunds and disputes.

Client review

WHITECAPITAL may request:
registration documents;
information about the director;
information about beneficial owners;
description of the business model;
website or payment resource;
description of goods and services;
supplier information;
invoices;
instructions;
other documents.

Risk assessment

Risk assessment may consider:
country of registration;
ownership structure;
business model;
goods and services;
customer geography;
expected turnover;
average transaction amount;
website and public documents;
refund risk;
sanctions risk;
fraud indicators.

Monitoring

WHITECAPITAL may monitor:
transaction volumes;
recurring payments;
unusual amounts;
refunds;
disputes;
chargebacks;

suspicious instructions;
mismatch between declared and actual activity.

Risk response

When risk is identified, WHITECAPITAL may:
request documents;
refuse an operation;
delay execution of an instruction;
suspend payouts;
restrict access to services;
terminate an agreement;
notify a bank or competent authorities where required.

Document retention

WHITECAPITAL retains documents related to client review, operations, instructions, reports, refunds and disputes for the period necessary to comply with legal, bank and internal policy requirements.