Anti-Money Laundering (AML), Counter Financing of Terrorism (CFT), and Know Your Customer (KYC) Policy

This policy is grounded in key principles, laws, regulations, and directives aimed at combating money laundering and related criminal activities. Frontier Horizon LTD is committed to implementing strong security measures and adopting ethical policies, practices, and procedures that ensure high professional standards and prevent both intentional and unintentional association with criminal elements.

Frontier Horizon LTD has developed a thorough Know Your Customer (KYC) program as a key part of its service, risk management, and control processes. The KYC program includes the following components:

Customer Acceptance

Frontier Horizon LTD enforces clear policies and procedures for customer acceptance, particularly identifying customers who may pose higher-than-average risk. Prior to onboarding new clients, KYC and due diligence processes are followed, evaluating factors like the customer's background, country of origin, public status, linked accounts, business activities, and other risk indicators. For high-net-worth individuals with unclear sources of funds, enhanced due diligence is performed. All new clients' funds are processed through reputable banks with their own anti-money laundering protocols. Senior management exclusively decides on relationships with higher-risk customers, such as politically exposed persons. Note that Frontier Horizon LTD does not accept U.S. citizens as clients.

Customer Identification

A core aspect of KYC is customer identification. For this policy, a customer includes any person or entity maintaining an account with Frontier Horizon LTD, beneficial owners, beneficiaries of intermedia transactions, or any party associated with a high-risk financial transaction. Frontier Horizon LTD has systematic procedures to verify the identity of all new customers before establishing a business relationship. These procedures emphasize obtaining reliable, difficult-to-counterfeit documents. Frontier Horizon LTD pays special attention to non-resident customers, ensuring that the inability to provide proper documentation does not result in shortcuts during verification. Customer identification continues throughout the relationship, with regular reviews whenever significant transactions occur or account operations change. If insufficient information is available about an existing customer, Frontier Horizon LTD promptly addresses the issue through compliance reviews.

Ongoing Monitoring of Accounts

Beyond establishing customer identities, Frontier Horizon LTD closely monitors account activity to det any deviations from expected patterns. KYC remains integral to the company's risk management and control processes. The depth of KYC measures depends on the risk level of each customer.

Risk Management

Frontier Horizon LTD applies a risk-based approach to its KYC program, tailoring specific measures higher-risk accounts based on factors such as customer background, country of origin, source of funds, and transaction types.

Frontier Horizon LTD ensures that its customer acceptance, identification, monitoring, and risk management policies align with regulatory requirements and industry best practices. These measures allow the company to effectively combat money laundering and terrorist financing while maintaining high compliance standards and reducing reputational and operational risks.

Frontier Horizon LTD reserves the right to request additional documentation from customers at any ti Customers are also required to promptly notify the company of any changes in ownership or other relevant information and provide updated documents as necessary.

Employee training, internal oversight, and fostering a culture of compliance are central to Frontier Horizon L approach to KYC. Staff members undergo regular training tailored to their specific roles and responsibilities, helping to ensure that KYC procedures are understood and implemented across the organization. By promoting a strong compliance culture, Frontier Horizon LTD aims to maintain effecti KYC procedures throughout its operations.

The company ensures proper record-keeping by retaining copies of customer identification documents, transaction records, correspondence, and other relevant documentation, making them available to authorities for auditing and regulatory purposes.

In summary, Frontier Horizon LTD AML, CFT, and KYC policies demonstrate its commitment to preventing money laundering and terrorist financing, while ensuring a comprehensive understanding of its customers' identities and activities. By adhering to these policies, Frontier Horizon LTD its operations, protects its clients, and remains in compliance with legal and regulatory obligations.