

## Giraffe Markets Suspicious Activity Reporting Policy

### 1. Introduction

Giraffe Markets is dedicated to maintaining the highest standards of ethics and integrity in the Forex industry. As part of our commitment to combating financial crime, we have established a Suspicious Activity Reporting (SAR) Policy to ensure the prompt identification and reporting of suspicious activities and transactions. This policy outlines the procedures for reporting, investigating, and managing such activities.

### 2. Definition of Suspicious Activity

A suspicious activity is any transaction, behavior, or occurrence that raises reasonable grounds to suspect potential involvement in money laundering, terrorist financing, fraud, or any other financial crime.

Suspicious activities may include, but are not limited to:

- Unusually large or complex transactions.
- Transactions with high-risk jurisdictions.
- Frequent deposits and withdrawals without a clear economic purpose.
- Transactions inconsistent with the client's established profile or typical activity.
- Transactions involving politically exposed persons (PEPs).
- Transactions that appear to be intended to avoid regulatory reporting thresholds.
- Any other activity that does not align with the client's known or declared business.

### 3. Reporting Process

Giraffe Markets is committed to creating an environment where employees are encouraged to report any suspicious activities they encounter. The reporting process includes the following steps:

- All employees, including compliance staff, are obligated to promptly report any suspected suspicious activity to the designated Anti-Money Laundering (AML) Officer or Compliance Department.
- Suspicious Activity Reports should include comprehensive details, such as the nature of the activity, involved parties, account details, transaction values, and any supporting documentation.
- The designated AML Officer or Compliance Department will review the submitted report to determine if it warrants further investigation.
- If the activity is deemed suspicious, the designated AML Officer or Compliance Department will file a Suspicious Activity Report (SAR) with the relevant regulatory authorities as required by applicable laws and regulations.
- The AML Officer or Compliance Department will also initiate an internal investigation to further assess the situation.

### 4. Protection of Whistleblowers

Giraffe Markets encourages a culture of reporting and provides protection to employees who report suspicious activities in good faith. Retaliation against whistleblowers is strictly prohibited.

### 5. Record-Keeping

Giraffe Markets is committed to maintaining records of all SARs and the associated investigations for the duration required by applicable laws and regulations.

**Email** : [Support@giraffemarkets.com](mailto:Support@giraffemarkets.com)

**Website:** [www.giraffemarkets.com](http://www.giraffemarkets.com)

## 6. Cooperation with Regulatory Authorities

Giraffe Markets will fully cooperate with relevant regulatory authorities in any investigations or inquiries related to SARs and suspicious activities.

## 7. Training and Awareness

Giraffe Markets will provide training and guidance to employees to enhance their awareness of suspicious activities and reporting requirements.

## 8. Compliance with Regulations

Giraffe Markets is fully committed to complying with all relevant Forex regulations, including MiFID II in Europe, and any other applicable local and international regulations pertaining to SARs and the prevention of financial crime.

## 9. Reporting Violations

Employees are encouraged to report any potential violations or breaches of this policy through the established reporting channels. Giraffe Markets is committed to taking appropriate action to address such violations.

This Suspicious Activity Reporting Policy is effective as of [Effective Date] and is subject to periodic review and updates to remain in compliance with changing regulatory requirements.

*For any questions or concerns regarding our SAR Policy, please contact our Compliance Department.*