

Please refer to my claims thoroughly, respectfully and professionally, in line with Ancient rule of INSEGORIA.

While I`m drafting this, my lawyers are assessing how much your actions (mainly manipulating of account statements, late AML intervention, no due diligence procedures, no evidence of HMR customs been notified of my trading for tax purposes and despite I reported that account statements are not clear to follow as there are mathematical errors, and cannot be used as true representation of profits/losses) have affected compliance with key CySEC regulations:

The 5 areas of regulatory compliance are:

1. Markets in Financial Instruments Directive (MiFID)

2. European Market Infrastructure Regulation (EMIR)

3. Capital Requirements Directive IV (CRD IV)

4. Anti-Money Laundering (AML) and Terrorism Financing

5. OECD Common Reporting Standard (CRS)

In my opinion there is evidence of violations in these areas:

2. European Market Infrastructure Regulation (EMIR)

EMIR, stands for the **European Market Infrastructure Regulation**, and it is Regulation (EU) No 648/2012. Its introduction affected the global OTC derivatives market reporting. Firstly, derivative contracts are traded on exchanges or electronic platforms, cleared through a central counterparty (CCP), reported to a trade repository (TR) and are subject to capital or other requirements to reflect the risk of transactions. CCP and TR are key participants in EMIR.

EMIR introduced a set of procedures regarding clearing, transaction reporting and risk management for firms that are subject to the regulation. Risk management requirements were phased in on March 2013, while reporting requirements came into force on February 2014.

How we help: We work with you and your internal team in understanding the EMIR regulation and its requirement for your firm.

- Support the in-house responsible person, required by CySEC, to draft adequate policies, perform daily reconciliations, identify and correct any errors occurred.
- Gather business requirements, map the data and specify the migration processes

- Identify derivative products your firm offers subject to the EMIR obligation
- Design, test and document business and operational processes
- Design, build and implement management information systems to monitor different risk types

4. Anti-Money Laundering (AML) and Terrorism Financing

The economic environment, through laws and regulations, has become stricter and more demanding in its effort to establish a stronger framework to deal with existing and new threats to the international financial system. A continuous **AML risk assessment** and the implementation of adequate controls to mitigate these risks must be performed by firms in order to successfully follow a risk-based approach. **Know-Your Customer (KYC)** procedures, including enhanced due diligence for customers that are categorized as high risk is the fundamental requirement.

How we help: We work with your board and senior management to build integrated, risk-based and efficient AML compliance control programmes.

- Prepare or work with the internal team to deliver the **AML Annual report** for submission to the regulator.
- Perform an AML risk assessment in line with regulatory requirements and best practices
- Create effective and sustainable AML compliance monitoring
- Design and implement effective customer due diligence processes
- Train senior executives and employees on key topics
- Prepare or update your policies and procedures, the **AML Policy**, to ensure compliance with the regulatory requirements and the next regulatory regime of Anti-Money Laundering (AMLD5).

5. The OECD Common Reporting Standard imposes obligations on financial institutions to review and collect information to identify an account holder's country of residence and then provide certain specified information to the home country's tax administration. Investment Firms as financial institutions are affected by **CRS**.