



Anny Trade – AML Policy Framework

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Executive Summary

This Anti-Money Laundering and Counter-Terrorist Financing (“AML/CTF”) Policy outlines the compliance posture of **Anny Trade**, a non-custodial trading automation platform that enables users to execute automated trading strategies through API connections to licensed cryptocurrency exchanges.

Anny Trade does **not** act as a financial intermediary. It does **not** custody user assets, does **not** execute order matching, and does **not** transmit funds or value between users or accounts. All user assets remain solely on custodial, regulated centralized exchanges, which are exclusively responsible for KYC, AML, sanctions screening, and customer due diligence obligations.

Under prevailing regulations across the United States, United Kingdom, European Union, Brazil, and other relevant markets, Anny Trade does **not** fall under the definitions of a Money Service Business, Money Transmitter, Virtual Asset Service Provider (VASP), Crypto Asset Exchange Provider, or Custodial Wallet Provider.

Nevertheless, Anny Trade voluntarily adopts a **risk-based AML/CTF framework** designed to safeguard the platform, support the integrity of exchange ecosystems, cooperate with regulated partners, and prevent misuse of its technology. This policy establishes the operational standards, internal controls, behavioral monitoring, sanctions restrictions, and governance processes that guide Anny Trade’s responsible operation.

1. Definitions & Scope of Business

1.1 Anny Trade (the “Platform”)

Anny Trade is a company incorporated under the laws of **Brazil**. The Platform provides **non-custodial crypto trading automation services**, strictly limited to automation of user-initiated trading activity on regulated centralized cryptocurrency exchanges.

1.2 Software

The Platform consists of software systems enabling users to send automated cryptocurrency trading instructions to third-party exchanges via API.

The software is available at <https://www.anny.trade>.

1.3 Crypto Exchange

A Crypto Exchange is an online marketplace where users may buy or sell cryptocurrencies. The exchange is the **custodian of digital assets** and is exclusively responsible for identity verification (KYC), AML/CTF controls, sanctions screening, and custody.

1.4 Money Transmitter

A money transmitter is an entity engaged in the acceptance and transmission of money or value on behalf of customers. Money transmitters must implement AML programs, conduct KYC, monitor transactions, and report suspicious activity.

1.5 Anny Trade Is *Not* a Money Transmitter

Anny Trade does **not** accept funds, custody assets, or transmit value between parties. All trades occur directly on the user's exchange account, and all custodial, financial, and regulatory obligations remain with the exchange.

2. Exchange Access & Eligibility Policy

Anny Trade operates **exclusively** with centralized cryptocurrency exchanges that maintain mandatory KYC and AML/CTF compliance programs.

2.1 Use of Licensed, KYC-Enforcing Exchanges Only

Users may only connect exchange accounts that have successfully completed the exchange's identity verification and AML requirements before any automation is enabled.

2.2 Prohibited Platforms

Anny Trade does **not** permit integration with:

- decentralized exchanges (DEXs)
- non-KYC or anonymous exchanges
- unregulated or offshore exchanges without AML programs

This is a strict operational rule.

2.3 No AML Bypass

The Platform does not, in any capacity, bypass or weaken exchange-level AML/KYC controls. All trading activity is subordinate to the custodial exchange's:

- customer due diligence
- sanctions screening
- KYC requirements
- suspicious activity monitoring

2.4 API Requirements

Anny Trade only accepts API keys with **trade-only permissions**.

API keys with withdrawal, transfer, deposit, or movement-of-funds permissions are automatically rejected.

2.5 Exchange Enforcement

If an exchange revokes access, reports suspicious activity, or flags an account:

- the corresponding API key is disabled,
- automation is suspended,
- the user must resolve all compliance issues directly with the exchange.

3. Disambiguation: Trading Automation Platforms vs Exchanges

This chapter aims to provide disambiguation between Trading automation (i.e the scope of Anny Trade) and Crypto Exchange platforms.

Under regulatory frames, Anny Trade classifies as a software services company offering non-custodial trading bots/automation by connecting with licensed Crypto Exchanges. Therefore Anny Trade does not fall under the capitulation of a financial institution nor custodian of crypto assets.

Third-party platforms that connect with exchanges for the purpose of trading automation are not qualified as exchanges themselves. These platforms are often referred to as trading bots or trading automation software or robo advisors, and their primary function is to facilitate and enhance the trading experience for users on established cryptocurrency exchanges or financial markets. Here's why they are not typically considered exchanges:

Lack of Order Booking (or Order Matching): These third-party platforms do not perform order matching functions or provide a centralized order booking for trading. Instead, they use APIs (Application Programming Interfaces) provided by established exchanges to send requests to execute trades on behalf

of users to the Crypto Exchange. The core exchange functions, such as order book management and trade settlement, still occur on the actual exchange.

Non-custodial: These third-party platform do not provide asset custody. The assets subject to trading activities remain on the customers account on the actual exchange.

Use of Exchange APIs: These platforms rely on APIs provided by exchanges to access market data and execute trades. They do not host their own order books or serve as marketplaces.

User Control and Strategy: Users of trading automation platforms retain control over their trading strategies and decisions. The platforms execute trades based on pre-set parameters and rules established by users, but they do not make independent trading decisions.

Auxiliary Services: Trading automation platforms typically offer additional features like technical analysis tools, risk management, and portfolio tracking, which are distinct from the core functions of an exchange.

Legal Distinction: In the observed regulatory environments, these platforms are either treated as separate entities from exchanges or fall outside the classification of Crypto Exchange or Crypto Asset Service Providers (EU). Essentially they are subject to different regulations and licensing requirements. Exchanges usually require licenses to operate as financial marketplaces, while trading automation platforms may have different regulatory considerations.

It's important to note that while these third-party platforms are not considered exchanges, they play a valuable role in the cryptocurrency and financial trading ecosystem by providing automation and advanced trading tools to users. Users should, however, exercise caution when using such platforms and ensure that they understand the terms, risks, and regulatory implications associated with their use.

4. AML/CTF Framework

The single aim of Anny Trade is to provide automated trading services without the need of handling asset custody or facilitating money transfers between two accounts. Therefore Anny Trade does not meet the criteria for registration with government financial authorities responsible for enforcing Anti Money Laundering (AML) policies.

Anny Trade adopts a risk-based AML/CTF program designed to prevent misuse of automation technology.

4.1 No Custody, No Funds Movement

The Platform never handles user funds or initiates transfers.

4.2 Behavioral Monitoring

Monitoring focuses on activity patterns, including:

- abnormal API request frequency
- abnormal API request trading amounts

4.3 Cooperation with Exchanges

If a custodial exchange raises an AML or security concern:

- Anny immediately disables automation for the affected account
- The user is instructed to resolve the issue with the exchange
- Relevant operational logs may be shared to support the investigation

4.4 Sanctions Controls

The Platform employs:

- IP geofencing - blocking of sanctioned jurisdictions (OFAC, EU, FATF)
- device fingerprinting

5. Internal Suspicious Activity Review (ISAR)

Anny Trade is not obligated to file Suspicious Activity Reports but maintains an internal ISAR process.

An ISAR is triggered by:

- Unusual trading volume and amounts behavior
- Compromised API keys

Possible actions:

- Disabling the API key
- Freezing automation
- Escalating the case to the exchange
- Banning users from the platform

6. Recordkeeping

Anny Trade maintains non-PII operational logs for compliance and security purposes:

- API usage patterns
- trade automation logs
- login and device metadata
- ISAR documentation
- sanctions/geofencing triggers

Retention: **5 years**, no user identity information is stored.

7. Annual Review

Anny Trade conducts an annual assessment of:

- AML-adjacent controls
- sanctions/geofencing effectiveness
- API-key security
- ISAR cases and outcomes
- partner exchange compliance requirements

8. Regulatory Landscape Evolution

Anny Trade acknowledges evolving global regulation of digital assets. The Platform commits to:

- tracking new regulatory classifications
- engaging constructively with regulators
- updating internal controls when appropriate
- pursuing registration if future laws classify automation platforms as regulated entities

Appendix A – Statement of AML Non-Applicability

Anny Trade does **not** meet the regulatory definitions of:

- Money Service Business (U.S.)
- Money Transmitter (U.S.)
- Crypto Asset Exchange Provider (U.K.)
- VASP under EU regulations
- Custodial Wallet Provider
- Brazilian VASP (under Federal Law No. 14.478/2022)

Anny Trade:

- does not custody assets
- does not handle private keys
- does not operate as an exchange
- does not transfer funds between accounts
- does not settle transactions internally
- relies solely on regulated custodial exchanges that enforce KYC/AML

Appendix B — Legal Opinion on VASP/CASP Classification (Brazil & EU)

1. Brazil – VASP Classification under Federal Law No. 14.478/2022

Under Brazilian Federal Law No. 14.478/2022 (“Lei das Criptomoedas”), a **Virtual Asset Service Provider (VASP)** is an entity that, on behalf of third parties, performs at least one of the following services involving virtual assets:

1. exchange between virtual assets and fiat currency;
2. exchange between virtual assets;
3. transfer of virtual assets;
4. custody or administration of virtual assets;
5. participation in services related to the issuance or distribution of virtual assets.

Anny Trade performs none of these regulated activities.

Anny Trade:

- does **not** custody or administer user assets;
- does **not** exchange fiat ↔ crypto or crypto ↔ crypto;
- does **not** transmit or transfer virtual assets between accounts;
- does **not** issue or distribute virtual assets;
- operates solely as **non-custodial trading automation software**.

All trades occur directly on regulated centralized exchanges under those exchanges’ custody, KYC, AML, and supervisory frameworks.

2. European Union – CASP Classification under MiCA (EU Regulation 2023/1114)

Under the EU Markets in Crypto-Assets Regulation (“MiCA”), a **Crypto-Asset Service Provider (CASP)** must be authorized if it provides, among other services:

- custody and administration of crypto-assets;
- operation of a trading platform;
- exchange of crypto-assets;
- execution of orders;
- placing or marketing crypto-assets;
- portfolio management;
- transfer services for crypto-assets;
- advice on crypto-assets.

Anny Trade does not engage in any MiCA-regulated services.

Specifically, Anny Trade:

- holds **no** custody or private keys;
- operates **no** trading platform or order booking;
- executes **no** exchange or settlement of trades;
- conducts **no** asset transfers;
- provides **no** discretionary portfolio management or advisory services.

Instead, Anny Trade exclusively automates user-defined trading instructions on **regulated centralized exchanges**, which remain solely responsible for custody, execution, settlement, and legal compliance.