

Anti-Money Laundering (AML) Policy

1. General Statement of Policy

The Company is unwavering in its commitment to uphold the integrity, security, and transparency of its operations, ensuring that its platform is not utilized for any unlawful or illicit purpose. This commitment encompasses the prevention of money laundering, terrorist financing, and all other activities involving criminally derived or suspicious funds. To achieve this, the Company has instituted a rigorous and comprehensive Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) compliance framework. This framework is fully integrated into the Company's business operations and is adhered to in all relevant jurisdictions.

2. Customer Identification and Due Diligence

The Company mandates that all Customers undergo comprehensive identity verification as a prerequisite to engaging in any transactions or accessing the Services. As part of the registration process, Customers are required to submit the following essential identifying information:

- Full legal name
- Date of birth
- Country of residence and complete residential address.

This information is vital for establishing a legitimate business relationship and for determining the Customer's eligibility to utilize the Company's Services.

In addition to the basic identifying information, the Company reserves the right to request, at its sole discretion and depending upon the Customer's risk profile, the following documents:

- A valid government-issued photo identification (e.g., passport, national identity card, or driver's license)
- Proof of residential address (e.g., a recent utility bill, bank statement, or government-issued correspondence, dated within the preceding 90 days)
- A recent photograph or live video of the Customer to verify the authenticity of the submitted identification
- Documentation or statements clarifying the source of funds or source of wealth, particularly in cases involving high-value transactions or heightened risk indicators.

The Company applies both Initial Customer Due Diligence (CDD) and ongoing monitoring procedures. In instances where a customer is classified as high risk, Enhanced Due Diligence (EDD) procedures will be initiated, which may include more detailed transaction monitoring, additional verification requirements, and potential restrictions on account activity.

3. Transaction Monitoring and Risk Management

The Company employs both automated and manual methods to continuously monitor all financial transactions conducted via its platform. The monitoring process is designed to detect and address the following:

- Transactions indicative of structuring, layering, or other patterns suggestive of money laundering or terrorist financing
- Suspicious or unusual patterns of behaviour in deposits or withdrawals
- Transactions that surpass predefined thresholds, triggering mandatory verification procedures.

The Company also screens all Customers against applicable sanctions lists and watchlists. In accordance with applicable law, the Company retains the right to suspend, freeze, or terminate any account in which illegal activities are suspected or identified.

4. Identification and Reporting of Suspicious Activity

In accordance with applicable AML/CTF regulations, the Company will take all reasonable steps to identify and investigate any activity that appears unusual, inconsistent, or potentially unlawful. Such activities may include, but are not limited to, transactions that:

- Are inconsistent with the Customer's known business or personal activities
- Involve funds derived from suspicious or unexplained sources
- Are likely to be associated with money laundering, terrorist financing, or other criminal activity.

In cases of suspected illicit activity, the Company may implement a variety of corrective actions, including, but not limited to, imposing temporary restrictions on the Customer's account, delaying transaction processing, or requesting additional information or documentation to verify the source of funds, the nature of the transaction, or the Customer's identity. These actions will be taken in accordance with both internal policies and relevant legal requirements.

In situations where the Company has reasonable grounds to suspect money laundering, terrorist financing, or other financial crimes, the Company will report such

suspensions to the appropriate regulatory or law enforcement authorities, in compliance with local regulations and international best practices.

5. Customer Responsibilities

By utilizing the Company's Services, the Customer affirms and agrees to the following obligations:

- The Customer shall not engage in or facilitate any unlawful activities, including but not limited to money laundering, terrorist financing, or the use of criminally derived funds
- All funds deposited into the platform must originate from lawful sources under the Customer's control
- The Customer shall promptly provide any requested documentation or information necessary to fulfill the Company's obligations under applicable AML/CTF regulations
- The Customer understands that any failure to cooperate or submission of false or misleading information may result in account restrictions, suspension, or termination, as well as potential legal consequences.

6. Record Retention and Access

The Company will retain all records related to identity verification, transaction history, and internal compliance actions for a minimum of five (5) years, or longer where required by law or regulation. All records are stored securely, and access is strictly limited to authorized personnel only. The Company will, as necessary, provide such records to regulatory or law enforcement authorities, in accordance with applicable legal and regulatory obligations.