

ANTI-MONEY LAUNDERING (AML) POLICY

The Company provides financial services that facilitate transactions in global financial markets, including the transfer and management of monetary assets. To meet global legal standards, the Company enforces strict policies aimed at preventing and detecting unlawful activities like money laundering, tax evasion, fraud, embezzlement, and terrorism financing. This AML Policy is established to safeguard the Company and ensure all operations comply with relevant laws.

The Company strictly follows applicable laws to combat money laundering. The Company fully cooperates with law enforcement and regulatory authorities whenever there is a reasonable suspicion of a Client's involvement in such offenses. Robust systems and protocols are maintained to identify, prevent, and manage financial crimes.

Verifying the identity of each Client is a mandatory requirement under the Company's KYC framework. Clients must adhere fully to these KYC and AML rules to guarantee that all transactions are lawful. The Company conducts thorough checks to confirm identity and validate the legitimacy of funds.

Clients are required to provide full disclosure regarding the origins of their funds intended for trading, supported by proper documentation. The Company keeps detailed records of transactions to detect any suspicious patterns but may restrict access to these records to protect privacy and comply with legal constraints.

Through their transactions, Clients consent to the collection and retention of their financial data by the Company and its service providers. These records may be used for audits or to report suspicious activities to relevant authorities, including submitting reports as legally mandated.

The Company is committed to providing ongoing AML training and awareness programs to its employees to ensure full understanding and compliance with regulatory requirements and internal policies.

The Company undertakes comprehensive internal audits to ensure AML compliance. Client backgrounds, especially politically exposed persons (PEPs), and their jurisdictions are evaluated for risk. Identified risks prompt actions aligned with legal requirements.

Due diligence procedures vary based on risk assessments: simplified checks apply to low-risk Clients, while heightened scrutiny and ongoing monitoring are reserved for high-risk Clients to uphold AML and counter-terrorism financing standards.

Business relations are only established with identified individuals. Third parties acting on behalf of Clients must submit appropriate authorization documents approved by the Company. Unauthorized or unverifiable third-party transactions may be invalidated without prior notice.

The Company reserves the right to decline or terminate transactions or relationships when Clients fail to provide requested documentation or when transactions lack a clear legitimate purpose. This measure ensures adherence to AML and KYC regulations.

Various risk factors, including Client business nature, legal status, and jurisdiction, are considered when assessing Client profiles. Elevated caution is exercised for unusual activities or dealings linked to

jurisdictions with poor AML enforcement or illicit operations.

The Company applies consistent verification processes to all Clients, regardless of prior relationships or referral sources, to maintain uniform compliance standards.

In cases where a Client is found to have limited legal capacity, the Company will assess their eligibility to use its services and may, if necessary, suspend or terminate the business relationship in compliance with applicable laws.

Client data and transaction profiles are regularly updated and monitored to detect any AML or financial crime risks. The Company remains vigilant in complying with all regulatory obligations.

The Company is dedicated to maintaining stringent AML standards and expects full cooperation from Clients in following all policies to ensure a secure and compliant environment.

Clients must cooperate promptly and fully with any inquiries or investigations related to AML matters, including providing requested information and documents. Failure to cooperate may result in suspension or termination of services.

