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AML/KYC policy.

1. Goals.

Money Laundering/Combating financing terrorism (AML/KYC/CFT) is the process of concealing financial transactions to make illegitimate money, derived from illegal activities such as embezzlement/corruption/illegal gambling/terrorism/organized crime, appear legitimate. Under a broad definition, the laundering process is accomplished in three stages:

- (a) Placement – the physical disposal of cash proceeds derived from criminal activity.
- (b) Layering – separating the illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the audit trail and provide anonymity.
- (c) Integration – the provision of apparent legitimacy to wealth derived from crime.

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If the layering process is successful, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter the financial system appearing as normal business funds. Its main objective is to hide the real source of illegal proceeds and make them legally usable, by converting them into legitimate money through a series of financial transactions. Technological advancements have helped money launderers adopt innovative means to transfer funds faster across continents making detection and preventive action more difficult. The attempted misuse of the financial system for the perpetration of fraud has been recognized globally as a major problem that needs to be continuously tackled at every level in a dynamic manner. As a Responsible Company, we consider it our moral, social, and economic.

Responsibility to prevent the misuse of the financial system for laundering proceeds of criminal activities and to coordinate the global war against money laundering. Our role in curbing this global reality begins with stringent “Know Your Customer” procedures. Imbibing the true spirit behind the international financial community’s resolve to fight money laundering, the Company has resolved to conduct day-to-day business with due skill, care, and diligence and seek to always comply with both the letter and the spirit of relevant laws, rules, regulation, codes, and standards of good practices. The purpose of the Anti-Money Laundering/Combating financing terrorism measures is to prevent the system of the Company from being used for money laundering and financing terrorism.

Therefore, AML / KYC and CFT measures formulated include:

1. Customer Identification Procedure – “Know Your Customer” procedures.
2. Monitoring of suspicious transactions.

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3. Appointment of the Compliance function.

4. Personnel Training.

5. Maintenance of Records.

6. Periodic testing of the implementation of AML / KYC / CFT and Compliance measures.

“Customer due diligence” (CDD) procedures include:

(a) Identifying a customer.

(b) Determining whether the customer is acting for a third party and, if so, identifying the third party.

(c) Verifying the identity of the customer and any third party for whom the customer is acting; The scope of these procedures and policies applies to all branches, offices, contractors, and affiliated companies of the Company and is to be read in conjunction with related operational guidelines issued from time to time. These procedures address the responsibility of management and employees for:

- Creating and implementing policies, procedures, and controls related to customer acceptance, maintenance, and monitoring.
- Customer due diligence.
- Declining or terminating business relationships or transactions.

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- Personnel training regarding customer acceptance, maintenance, and monitoring.
- Monitoring accounts, activities, policies, procedures, and plans.
- Awareness and communication.
- Management reporting.
- Reporting (SAR/STR) to Financial Intelligence Unit (FIU).

Key Principles and Objectives.

This procedure manual has the following key principles and objectives:

- The Company will introduce necessary policies and procedures to ensure that the risk of possible money laundering, proliferation financing, or financing of terrorism and related activities associated with customers' relationships and transactions is managed and mitigated.
- Customer due diligence procedures regarding business relationships and transactions will be developed and implemented as required by applicable legislation.
- To establish a business relationship with a potential customer, appropriate information has to be obtained from the person seeking to establish the relationship. The information obtained is to be verified by comparing it with information obtained from source(s) as required by legislation.

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- The Company may decline or terminate business relationships or transactions where there appears to be a risk that its services and infrastructure will be abused for the purposes of money laundering and/or terrorist financing.
 - The Company will provide the appropriate training to all affected employees on customer acceptance, maintenance, and monitoring.
 - The Company will proactively monitor adherence to this procedures manual, ensuring compliance with its obligations as required by legislation.
 - Affected company employees must be made aware of the contents of this manual, inclusive of their responsibilities and actions expected of them.
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- Management reports must be produced to allow the company actively and effectively monitor customer acceptance, maintenance, and monitoring initiatives.

2. Compliance function.

The Company's compliance function consists of two levels and addresses the responsibilities of Money Laundering Reporting Officer and Money Laundering Compliance Officer.

1. CEO (who also serves as Money Laundering Reporting Officer) and the Board of Directors of the Company. >Responsibilities of the CEO and the Board of Directors include:

I. Create a culture within the Company that supports the achievement of compliance objectives by ensuring rigor in the recruitment, selection, individual development, and monitoring of compliance personnel.

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II. Develop and promote, among Company's personnel at all levels, a high degree of awareness of the crucial importance of compliance with AML/CFT and KYC procedures.

III. Oversee the development, ongoing update, and implementation of compliance-related policies and procedures.

IV. Work in close collaboration with the Compliance Department to ensure there is an effective relationship between the Compliance Department and the members of the Board.

2. Company's Compliance department, headed by Chief Operational Officer (who serves as Money Laundering Compliance Officer). The Money Laundering Compliance Officer is responsible for:

I. Appointment of compliance officers (personnel of the Compliance department)

II. Monitoring, coordination, and control over the day-to-day activity of compliance officers.

III. Training of compliance officers. IV. Reporting to the CEO and the Board of Directors of the Company if the Compliance department has a reason to believe that a suspicious transaction has/ may have resulted in money laundering.

V. Periodic control of implementation of AML / KYC / CFT measures and compliance procedures.

VI. Periodic review and updating of the present Manual. Responsibilities of the Compliance department include. I. Putting in place necessary controls for the detection of suspicious transactions. II. Cancelling or forbidding the transaction.

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VII. Receiving disclosures related to suspicious transactions from the staff or otherwise.

VIII. Training staff and preparing detailed guidelines/handbooks for the detection of suspicious transactions.

3. “Know your customer” procedures.

Customer security is a key consideration for KW Investments Limited and we take our commitment to safeguarding our client's best interests extremely seriously.

We have implemented a series of KYC (Know Your Client) procedures designed to secure the private information of our clients while keeping the company in line with compliance best practices and policies for financial services companies. These are aimed at preventing any instances of identity theft, money laundering, fraud, or terror activity.

We operate on a strict Zero Tolerance basis. Any fraudulent activity will be documented and will result in the immediate closure of any trading accounts related to such activity. Funds deposited in any such accounts will be forfeited.

These procedures secure your personal data, and your financial transactions remain secure. Without completing our KYC procedures, your trading activity will be limited, and you will not be able to withdraw funds from your account.

Opening and funding a trading account with us will require the following documents to be submitted:

1. Proof of Identity document (coloured photo or scan), the following can be submitted:

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- Passport
- National Identity card

Proof of Identity document must clearly contain the following:

- Full name
- Date of birth
- Date of issue and expiration
- Clear photo

The minimum validity period of an identity document must be 6 months before the expiration date.

2. Second identity document, (coloured photo or scan), the following can be submitted:

- Driving license
- Insurance ID
- Certificate of live birth/marriage/divorce
- Diploma
- Military ID

3. Coloured photo of a document that confirms your address and is not older than 90 days from the date of issue. The photo must show your full address of residence, first and last name, date of issue, and official stamp or barcode. You may submit your:

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- Utility bill
- bank statement
- check
- certificate of residency
- penalty notice
- legal agreement

4. Coloured photos of both sides of the signed card/s you used to deposit. For your security, please cover the CVV number and the seventh to twelfth digits of your card/s number/s, leaving the first six and last four digits visible on both sides of your card/s. The cardholder's name/s and expiry date/s must be visible.

Submit the required documents in PDF / JPEG / JPG / PNG image formats to the compliance department support@GXMTTrading.com.

Submit your compliance as soon as possible after activation of your trading account. Please note that your missing compliance may result in limitations on your trading account.

Consider that with missing compliance any withdrawal requests from your trading account will not be processed.

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Monitoring of withdrawal requests.

The company's withdrawal policy is set as follows: – The Customer has a right to withdraw funds at any time. The company's bonus, if applicable, can be withdrawn only upon meeting certain conditions, as defined by the promotion campaign that has resulted in granting the bonus to the Customer. – The Customer must provide the Company with the signed withdrawal application form. – The requested amount must be withdrawn to the same account that was a source of funds subject to the withdrawal request. Examples: if the Customer used a bank wire transfer – the withdrawal will be made via a wire transfer to the same account, if it was charged from a credit card – the withdrawal will be credited to the same credit card and so on. The appropriate compliance procedure for withdrawals is set below. Compliance procedures applicable in cases of withdrawals by the Customers.

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Step	Transaction/function	Responsible staff	Result
	Compliance procedures applicable in cases of withdrawals by the Customers		
1	Customer provides the Company with a signed withdrawal form.	Staff responsible for Retention for the Customers	Review the withdrawal from and proceed to Step 2.
2	Identification of the Customer (ID, telephone number, and other details). Confirming that the Customer's account has sufficient funds for withdrawal and, to the extent bonus funds are involved, that the Customer met all conditions, as defined by the promotion campaign that has resulted in	Staff responsible for Retention for the Customers	If identification and confirmation are successful, submit the withdrawal form to the Compliance department. If not – inform the customer.

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	granting the bonus to the Customer.		
3	Identification of the Customer, review of Customer's recent transactions and determining the appropriate method of withdrawal.	Compliance department. CEO (if applicable) The Board of directors (if applicable)	If the review is successful – submit the withdrawal form to the Financial Department for withdrawal execution. In case any problem occurs, the Compliance department may return the application to the staff responsible for retention for the Customers for additional information. In high-risks situations the Compliance department may report to the CEO of the Company. In such cases the CEO may take a final decision upon the withdrawal or, if the situation is extraordinary, report to the Board of directors.

To the extent possible, all suspicious transactions should be reported to the Compliance department before they are executed. Full details of all suspicious transactions, whether executed or not, should be reported to the Compliance department. A suspicious transaction, noted prior to its execution, should be executed only with the pre-approval of the Compliance department. The Compliance department shall have reasonable access to all necessary information/documents that might be needed to execute its responsibilities in an effective and due diligent manner.

The Compliance department is responsible for informing the CEO about any significant suspicious activity noted. The CEO should escalate any extraordinary suspicious activity to the Board of Directors of the Company. The Board of Directors takes a decision to: – escalate any extraordinary suspicious

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activity to the Financial Intelligence Unit (FIU) by Suspicious Activity Report (SAR) or Suspicious Transaction Report (STR). SARs and STRs include detailed information about transactions that are or appear to be suspicious. The goal of SARs and STRs filings is to help the government identify individuals, groups and organizations involved in fraud, terrorist financing, money laundering, and other crimes. The purpose of a suspicious activity report is to report known or suspected violations of law or suspicious activity observed; – take reasonable measures to ascertain the purpose of the transaction, the origin, and ultimate destination of the funds involved and the identity and address, of any ultimate beneficiary.

4. Training of personnel.

The Company maintains an onboarding and ongoing employee-training program to ensure that relevant staff is adequately trained in KYC procedures. The timing and content of training vary based on the target audience. Training requirements should have a different focus for new staff, staff dealing with new customers or customer retention. The new staff is educated about the basics of AML / CFT and KYC procedures and the importance of implementation of all relevant compliance policies. These basic compliance requirements are presented to them during the two-week onboarding training that every new staff member must attend. Staff members who deal directly with the customers are trained to verify the identity of new customers, exercise due diligence in handling accounts of existing customers on an ongoing basis and detect patterns of suspicious activity. Regular refresher training is provided to ensure that employees are reminded of their responsibilities and are kept informed of new developments. It is crucial that all relevant staff fully understand the need

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for and implement KYC policies consistently. A culture within services that promotes such understanding is the key to a successful implementation.

Penalties Due to Non-Compliance.

The employees are expected to comply with compliance policies and procedures outlined in this manual. Failure to comply might have serious implications including disciplinary action and, in some cases, even individual criminal penalties.

Communication with Employees.

Open channels of communication are set between the Compliance Department of the Company and all other employees of the Company. Periodic updates about AML / CFT and KYC issues are provided to the staff of the Company. The Company has established an onboarding and ongoing employee-training program to ensure that the staff is adequately trained in compliance procedures. Training objectives have different focuses on frontline staff, compliance staff and retention staff to ensure that all those concerned fully understand the rationale behind the procedures and policies and implement them consistently.

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