

XALP GLOBAL MARKETS

KYC/AML) POLICY

XALP Global Markets is committed to maintaining the highest standards of compliance in relation to Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF). The objective of this policy is to actively prevent the use of the Company's services for money laundering, terrorist financing, or any other financial crime.

To assist regulatory authorities in combating financial crime, all financial institutions are required to obtain, verify, and record information identifying each person who opens an account. XALP Global Markets is therefore obligated to monitor and report any suspicious client activity in accordance with applicable laws and regulations.

Money Laundering Defined

Money laundering is the process of concealing the origin of funds derived from illegal activities (such as fraud, corruption, or terrorism) by converting them into seemingly legitimate funds or investments.

The process typically occurs in three stages:

1. Placement

The initial introduction of illicit funds into the financial system. This may involve deposits into bank accounts, money transfers, or the purchase of high-value assets. Structuring (also known as "smurfing") may be used to avoid detection.

2. Layering

The movement of funds through multiple transactions to obscure their origin. This includes transferring funds between accounts or converting them into different financial instruments.

3. Integration

The reintroduction of funds into the economy as apparently legitimate funds, often through the purchase of goods or services.

AML Commitment

XALP Global Markets adheres strictly to AML and CTF principles and takes all reasonable steps to prevent its services from being used for illegal purposes. The Company does not accept or make payments in cash under any circumstances.

The Company reserves the right to suspend or terminate any client account where activity is deemed suspicious or potentially linked to money laundering or other criminal conduct.

Company Procedures

XALP Global Markets ensures that all clients are properly identified as natural or legal persons. The Company complies with all applicable AML laws, regulations, and guidelines issued by relevant regulatory authorities.

The AML framework includes:

1. Know Your Customer (*KYC*) and Customer Due Diligence (*CDD*)
2. Ongoing monitoring of customer activity
3. Record keeping and documentation

Know Your Customer (*KYC*)

All clients must complete a verification process before establishing a business relationship with XALP Global Markets. The Company ensures that satisfactory evidence of identity is obtained.

Enhanced due diligence is applied to high-risk clients, including those from jurisdictions with weak AML controls or higher corruption risks.

Individual Clients

Clients must provide the following personal information:

- Full name
- Date of birth

- Country of origin

- Residential address

To verify identity, clients must submit:

1. Valid passport; or
2. Driver's license; or
3. National identity card;

Additionally, proof of address is required (e.g., utility bill or bank statement), not older than **three (3) months**.

[Where documents are not in English, a notarized translation may be required.]

Corporate Clients

Where the applicant is not a publicly listed company or a subsidiary of one, the following documents must be provided:

1. Certificate of Incorporation
2. Memorandum and Articles of Association
3. Proof of registered address (e.g., Certificate of Good Standing)
4. Board resolution authorizing account opening
5. Powers of attorney (if applicable)
6. Identification documents for directors and authorized signatories
7. Identification of ultimate beneficial owners (UBOs)

Ongoing Monitoring

XALP Global Markets continuously monitors client transactions to detect unusual or suspicious activity. Transactions inconsistent with a client's known profile or business activities are flagged for review. Both automated systems and manual reviews are utilized.

Record Keeping

The Company maintains records of:

- Client identification documents
- Transaction data
- AML-related reports and monitoring records

All records are retained for a minimum of **seven (7) years** after the termination of the business relationship.

Measures and Reporting

Where suspicious activity is identified, XALP Global Markets will:

- Report the activity to the relevant regulatory authority in accordance with applicable laws
- Suspend or restrict the client account where necessary
- Terminate the business relationship if warranted

The Company retains full discretion in handling suspicious accounts.

Contact:

For further information, please contact:

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